

EVALUATION - VIOLATION - ENFORCEMENT FORM

10/94 VERSION

| | | |
|---|------------------------------------|----------------------------|
| Handler ID Number <small>Page 3</small> | Contact Name <small>Page 3</small> | RESERVED FOR EPA USE |
| W:V:D:0:8:0:6:4:5:8:3:1 | Harold N. Hicks | |
| Handler Name <small>Page 3</small> | | |
| Street <small>Page 3</small> | | City <small>Page 3</small> |
| Ashland Chemical | | NEAL |
| Big Sandy River Road | | |

UNIVERSE CHANGE REQUIRED Page 4 YES ☐ NO ☐

I. Indicate the facility's current universe(s):

Page 4

III. Indicate the new transporter status (Mark here only if the facility requires a transporter status change):

II. Indicate the new RCRIS Generator Universe (mark only one):

LQG ☒ CEG ☐ NON-HANDLER ☐
SQG ☐ CLOSED ☐

Page 4

NOTE: All TSD activity changes must be handled by the state data coordinator and cannot be made using this form

Transporter ☐
If the transporter box is checked, you must check at least one of the boxes below:

Mark Mode of Transportation
☐ Air ☐ Water
☐ Rail ☐ Other
☒ Highway

Non-Transporter ☐

Check this box if the facility is currently listed in RCRIS as a transporter and no longer transports hazardous waste.

EVALUATION Add ☒ Change ☐ Delete ☐ Page 5

| Date | Number | Agency | Type | Reason | Branch | Person |
|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| 0:9:1:8:9:7 | | E | CEI | 6:3 | | |
| <small>Page 5</small> | <small>Page 5</small> | <small>Page 5</small> | <small>Page 6</small> | <small>Page 7</small> | <small>Page 7</small> | <small>Page 7</small> |

Page 8 AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

| | | | | | | | |
|---|------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|
| GGR <input checked="" type="checkbox"/> | GRR <input type="checkbox"/> | TGR <input type="checkbox"/> | DCL <input type="checkbox"/> | DIN <input type="checkbox"/> | DMR <input type="checkbox"/> | DTR <input type="checkbox"/> | FEA <input type="checkbox"/> |
| GLB <input checked="" type="checkbox"/> | GSC <input type="checkbox"/> | TMR <input type="checkbox"/> | DCP <input type="checkbox"/> | DLB <input type="checkbox"/> | DOR <input type="checkbox"/> | DTT <input type="checkbox"/> | CSS <input type="checkbox"/> |
| GMR <input checked="" type="checkbox"/> | GSQ <input type="checkbox"/> | TOR <input type="checkbox"/> | DFR <input type="checkbox"/> | DLF <input type="checkbox"/> | DPB <input type="checkbox"/> | DWP <input type="checkbox"/> | |
| GOR <input checked="" type="checkbox"/> | GEX <input type="checkbox"/> | TWD <input type="checkbox"/> | DGS <input type="checkbox"/> | DLT <input type="checkbox"/> | DPP <input type="checkbox"/> | DBF <input type="checkbox"/> | |
| GPT <input checked="" type="checkbox"/> | GBF <input type="checkbox"/> | DCH <input type="checkbox"/> | DGW <input type="checkbox"/> | DMC <input type="checkbox"/> | DSI <input type="checkbox"/> | CAS <input type="checkbox"/> | |

Comments Page 9

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION Page 11

| Agency | Number | Area | Date Determined | Agency | Number | Area | Date Determined |
|--------|--------|------|-----------------|--------|--------|------|-----------------|
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

VIOLATION Add ☐ Change ☐ Delete ☐ Page 12 Link to Above Evaluation? (Y/N) ☐

| Agency | Number | Area | Class | Regulation Type | Regulation Citation |
|--|------------------------|------------------------|------------------------|------------------------|-------------------------|
| E | | GGR | | E.R | Page 13 40CFR 265.16(d) |
| <small>Page 12</small> | <small>Page 12</small> | <small>Page 12</small> | <small>Page 13</small> | <small>Page 13</small> | |
| Date Determined | Priority | Branch | Person | Scheduled | Actual |
| 0:9:1:8:9:7 | | | | | |
| <small>Page 14</small> | <small>Page 14</small> | <small>Page 14</small> | <small>Page 14</small> | <small>Page 14</small> | <small>Page 15</small> |
| Comments No Job posted not description referencing file, activity. | | | | | |

☐ Required ☐ Required if pertinent ☐ Required only for previously reported data ☐ Not Required by EPA

RCRA SUMMARY
ASHLAND CHEMICAL MALEIC ANHYDRIDE PLANT
NEAL, WV

This facility is a generator of hazardous waste. The hazardous waste generated in the largest quantity is acid wastewater. This wastewater is generated during the production unit cleanout which occurs after every fourth production cycle. This waste stream is pH adjusted in tanks on site and shipped off-site as a nonhazardous waste.

A second wastewater stream is generated that can have a pH of 2.0 SU or less and therefore be considered hazardous. This wastewater is pH adjusted in the abatement tank and piped across the Big Sandy River to an Ashland refinery in Kentucky.

Lesser amounts of other hazardous waste are generated and managed on site. A 90 day drum accumulation area is used along with a satellite accumulation area adjacent to the facility laboratory.

The only RCRA violation documented during the inspection concerned job descriptions of personnel who work with hazardous waste.

RCRA Inspection
Ashland Chemical Maleic Anhydride Plant
Neal, West Virginia
EPA ID No. WVD080645831
Inspection date: September 15-18, 1997

An RCRA Compliance Evaluation Inspection (CEI) was conducted at Ashland Chemical Maleic Anhydride Plant as part of a multimedia inspection initiated by the regional office. Personnel participating in or contacted during the RCRA portion of the multimedia inspection included the following:

USEPA

| | |
|-----------------|--|
| James L. Bailey | Environmental Scientist Wheeling Office |
|-----------------|--|

| | |
|------------------|-------------------|
| Elizabeth Barnes | ECO Region 111 |
|------------------|-------------------|

WVDEP

| | |
|---------------|---------------------------------------|
| Thomas Fisher | Field Supervisor Charleston Office |
|---------------|---------------------------------------|

| | |
|-------------|-------------------------|
| Penny Brown | Environmental Inspector |
|-------------|-------------------------|

Ashland Chemical

| | |
|--------------|--------------------------------|
| Steve Lochow | Process Engineer Neal Plant |
|--------------|--------------------------------|

| | |
|---------------|------------------------------|
| Perry Foxwell | Office Manager Neal Plant |
|---------------|------------------------------|

| | |
|------------------|----------------------------------|
| Edward D. Graves | Staff Engineer Columbus, Ohio |
|------------------|----------------------------------|

The Ashland Chemical Maleic Anhydride plant located at Neal, WV is a generator of hazardous waste. This facility manufactures maleic anhydride by oxidizing butane in the presence of a catalyst.

Hazardous waste generated at this facility during the production of maleic anhydride is an acidic wastewater stream. This acid wastewater is generated by cleaning out the production unit and ancillary equipment.

The acid wastewater stream is collected in the M-1410 A and B tanks, pH adjusted and shipped as a nonhazardous waste to one of three commercial wastewater treatment facilities. The three facilities used are All Waste, Clean Harbors, and Waste Management. During August 1997 twenty seven shipments went out of the Neal Plant. The weight of the shipments varied from 42,240 pounds to 48,920 pounds. The amount of acid wastewater shipped out in August 1997 was 1,218,960 pounds.

Additional information obtained on this waste material includes a copy of a Bill of Lading which has an MSDS and records documenting the August shipments attached. This information is included as RCRA Attachment No 1.

Process wastewater is also generated on site. This wastewater stream is mixed with boiler blowdown, pH adjusted in the abatement scrubber, and piped across the Big Sandy River to the Ashland Refinery in Ashland Kentucky for treatment. This waste stream was sampled and analyzed for hazardous constituents. The sample was nonhazardous. The results are included in RCRA Attachment No. 2.

Hazardous as well as nonhazardous waste streams are generated by this facility and have been profiled by Ashland Chemical personnel. A list of these waste streams under the heading of nonregulated and hazardous waste was provided by facility personnel and included in this report as RCRA Attachment No.3. Also, included in Attachment No. 3 is a copy of the last Annual Report submitted to the state.

Ashland Chemical personnel provided a handout to the inspectors entitled "Waste determination for Neal, WV process wastewater Ashland Chemical multimedia inspection." In this handout is discussed the rational and the RCRA regulations addressing the Neal plant waste stream disposal practices.

One area considered significant by EPA was the product purge prior to sampling for QA/QC tests. The company personnel contend the material is a de minimus loss and is therefore exempt. The purge prior to QA/QC sampling is commercial chemical product. It is collected in a bucket which is labeled maleic anhydride. The bucket is closed except when adding or removing product. This material is, in essence, handled as satellite accumulation. The purge material is disposed of by flushing the bucket into the M-1411 basin (pit). The RCRA hot line was utilized on September 30,

1997. The hot line representative researched the question and the explanation included references to the November 17, 1981 federal register. In summery, the hot line representative was in full agreement with Ashland Chemical. The fact that they managed the material over time between generation and ultimate disposition does not detract from its exemption status. A copy of this handout is included as RCRA Attachment No. 4.

Other areas addressed during the RCRA inspection included:

Satellite accumulation of hazardous waste
Manifests and Land Disposal Restriction Requirements (LDR).
Weekly Inspections of the 90 day accumulation area.
Waste accumulation.
Contingency (Preparedness and Prevention) Plan
Training

The only deficiency documented in the hazardous waste program in place at the Neal plant concerned job titles. Neither the job titles required by 40 CFR 265.16(d)(1) nor the written job description required by 40 CFR 265.16(d)(3) reference any hazardous waste activities actually performed by the facility employees.

Additional information on the hazardous waste program in place at the Neal plant is included in the two EPA Checklists completed as part of this inspection and included as RCRA Attachment No. 5.

Areas of Concern

Stained areas adjacent to the railroad tank car product loading area and the railroad tank car clean out area must be addressed. These stained areas were noted in earlier West Virginia Department of Environmental Protection inspection reports. Follow-up action by the state or company personnel has not been forthcoming. The instillation of drip pads would eliminate future problems in these areas.

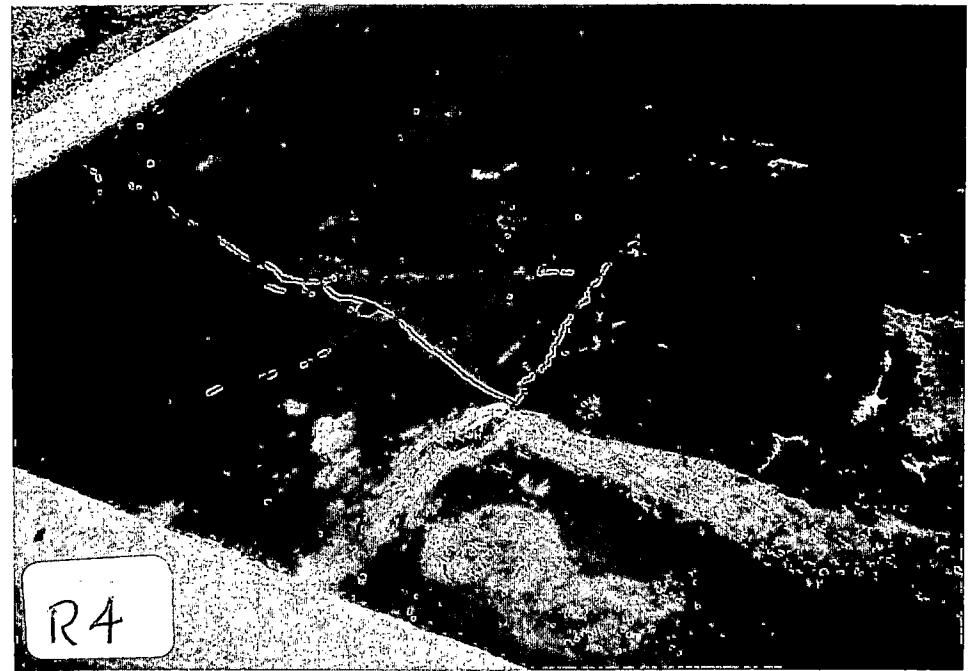
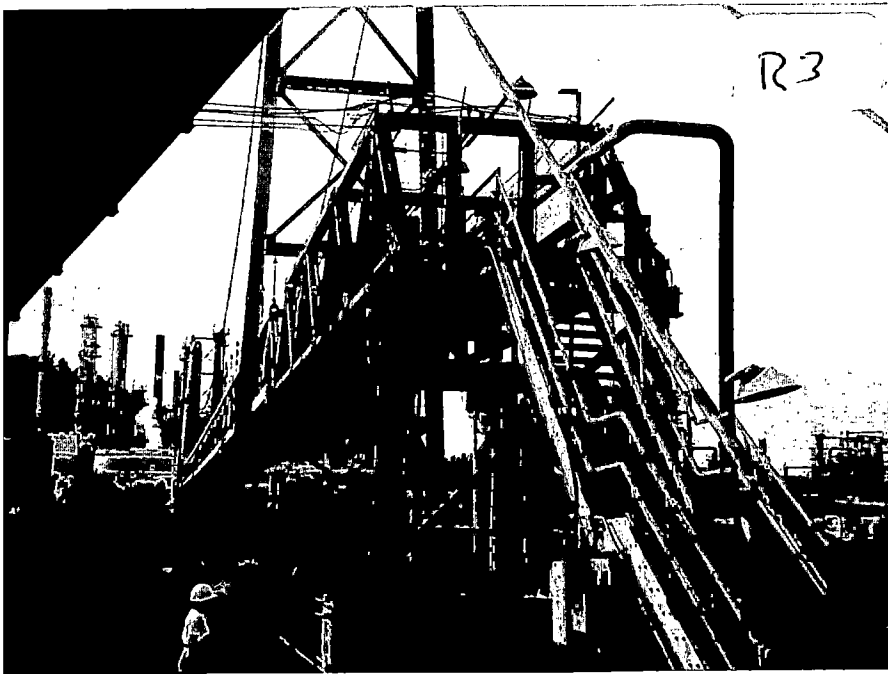
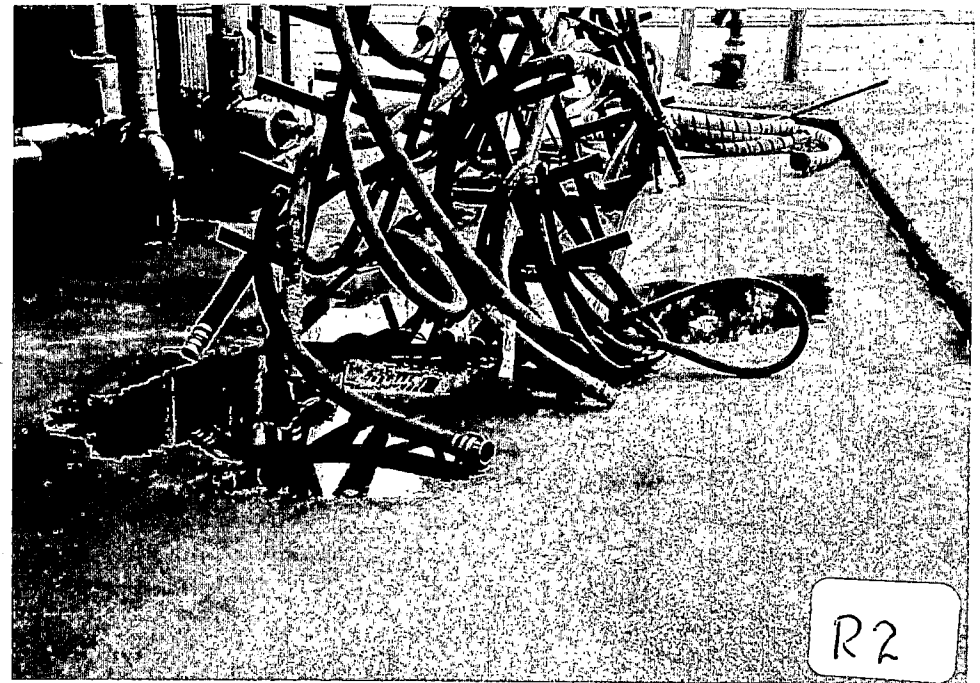
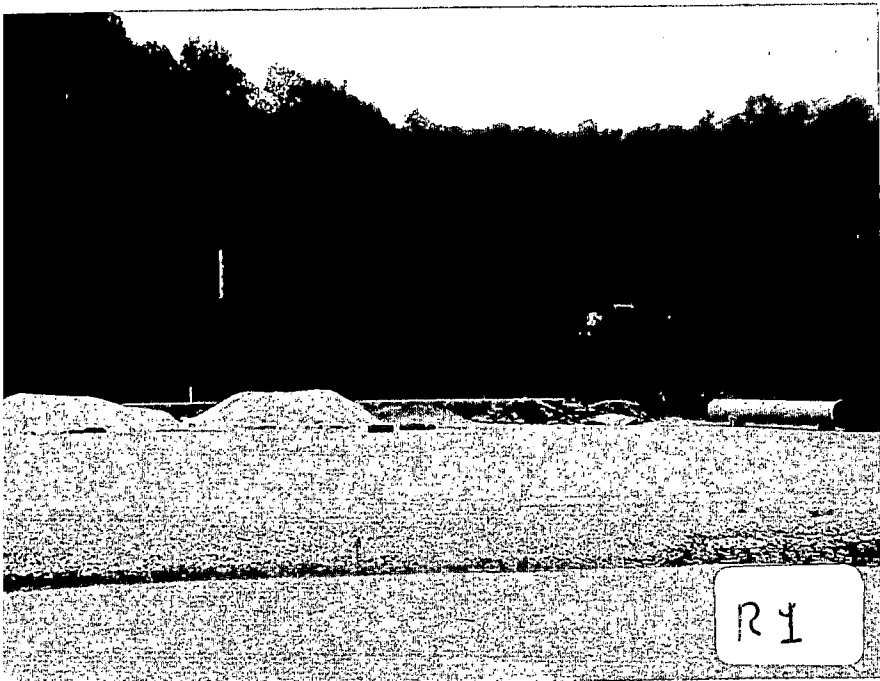
Photographs were taken as part of this inspection and are included along with a photo log.

RCRA
PHOTO LOG

ASHLAND CHEMICAL MALEIC ANHYDRIDE PLANT
NEAL, WV
SEPTEMBER 15-18, 1997

- R1. Construction debris, tested for RCRA characteristics and documented nonhazardous.
- R2. Hose drain rack. Hoses are used to transfer a variety of chemicals.
- R3. Walk bridge across Big Sandy River connecting Ashland Chemical and the Ashland refinery. The primary function of the bridge is to support pipelines.
- R4. One of the several documented cracks in the concrete within containment areas. Reportedly a program has been initiated to address this issue.
- R5. Tanks M-1410 A and B (top of tanks). Wash water from the production units is accumulated in A and B tanks, pH adjusted and shipped off site as nonhazardous waste.
- R6. Bottom of M-1410 tanks and the stainless steel lined pit in which they are located. The liquid in the bottom is reported to be water from a recent rain event.
- R7. Satellite accumulation area (for hazardous waste) adjacent to the laboratory.
- R8. Hazardous waste 90 day accumulation area.
- R9. Railroad tank car wash out area. Additional containment (drip pad) would eliminate the requirement of leak/spills clean-up in future.
- R10. Product loading area for tank trucks. Note curbed area with impervious base in this loading area.

- R11. Railroad tank car loading area. A drip pad would have
- R12. contained spillage indicated by discolored gravel. Stainless steel tray in middle of track is plumbed to M-1411 wastewater basin.
- R13. Sump M-1411 is the accumulation point for liquid in the process sewers. Sump M-1411 does not normally receive the process equipment wash water.
- R14. Maleic Anhydride sampling point and blowdown prior to sampling. Buckets are used to accumulate blowdown.
- R15. Abatement scrubber samples point, Tank D-330.
- R16. The abatement scrubber, Tank D-300.



ASHLAND CHEMICAL MALEIC ANHYDRIDE PLANT
NEAL, WV

Hose rack adjacent to TANK 330.

Hoses are used to transfer a variety
of materials. SEP 17, 1997

J J Bailey

Ashland Chemical Maleic Anhydride Plant
Neal, WV

Acidic wastewater truck loading
station.

Note cracks in impervious base.

SEP 17, 1997

J J Bailey

ASHLAND CHEMICAL Maleic Anhydride
NEAL WV

Sept 17, 1997

Construction Debris, tested Non hazardous
will be transported to a industrial
landfill

J J Bailey

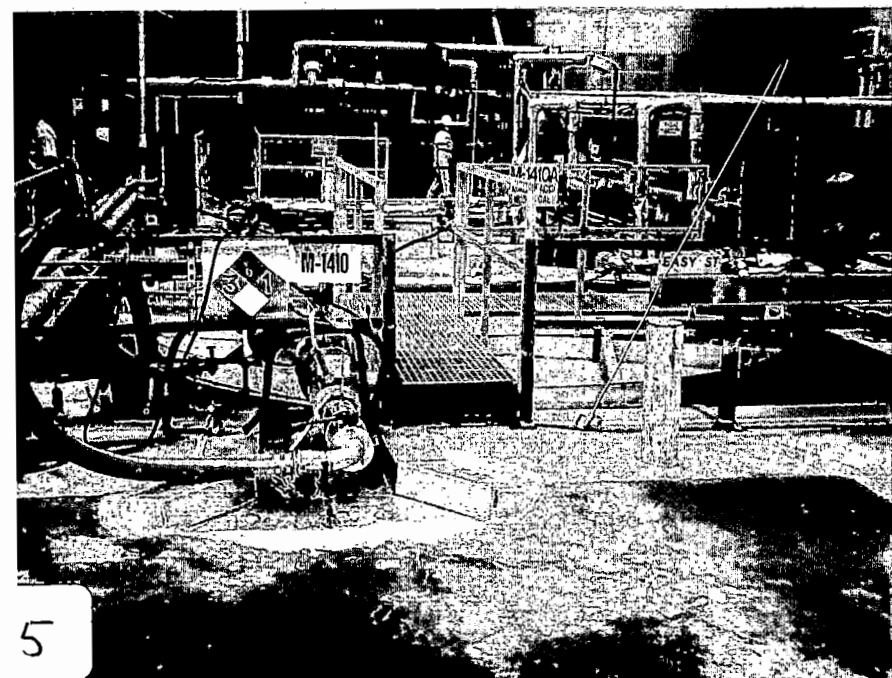
Ashland Chemical Inc. Maleic Anhydride
Plant, Neal, WV

SEP 17, 1997

Walk bridge across Big Sandy River.

Primarily used for pipe line crossings

J J Bailey



Ashland Chemical Maleic Anhydride Plant
Tanks M-1410 A & B are located in a
stainless steel lined pit which is
partially shown here. The liquid
probably is water from recent
rain event.

Sep 17, 1997

J J Bailey

Ashland Chemical Maleic Anhydride Plant
Neal, WV. Sep 17, 1997

Tanks 1410 A and B. (TOP OF TANKS)
Wash water. After 4 production cycles,
is collected here and stored until pH
is adjusted and wastewater is
trucked off site.

J J Bailey

Ashland Chemical, Maleic Anhydride plant
Neal, WV. Sep 17, 1997

Hazardous Waste less than
90 day storage area. It is located
adjacent to the Big Sandy River and
could be in jeopardy when the Big
Sandy River floods.

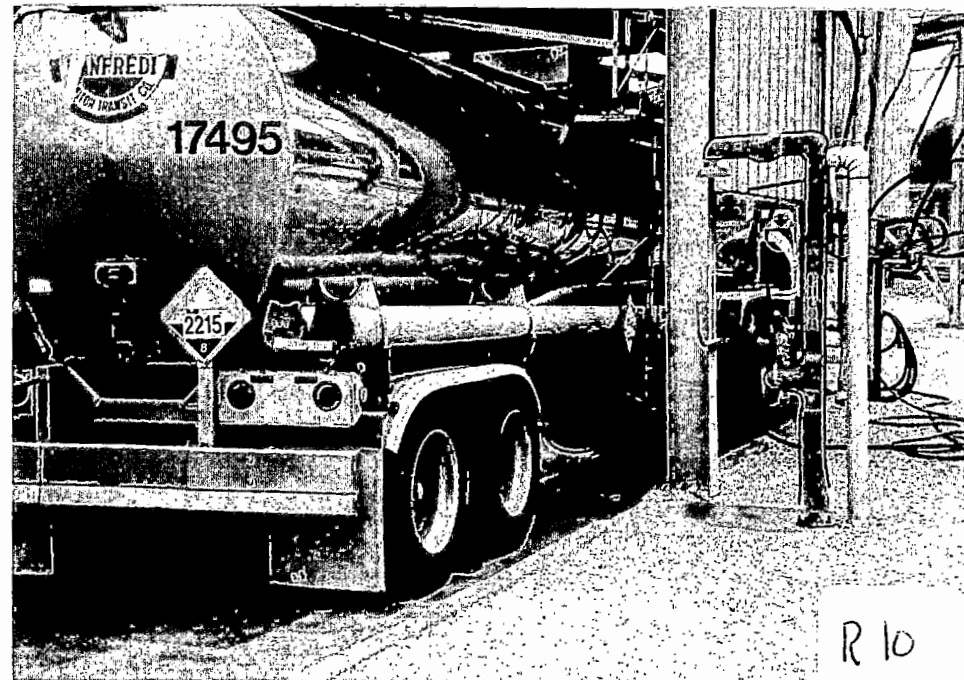
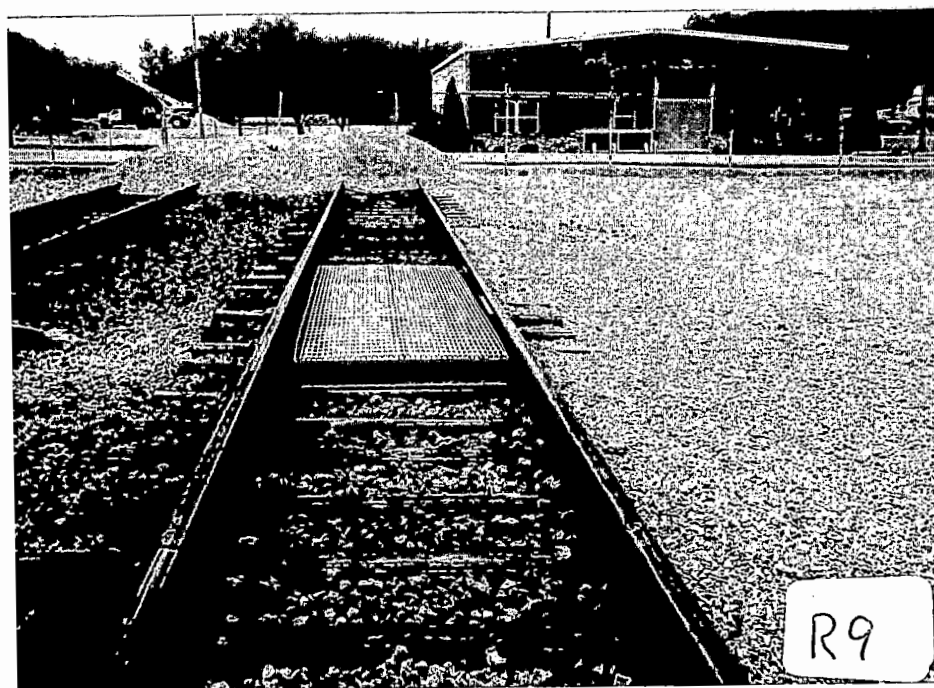
J J Bailey

J J Bailey

one drum containing hazardous waste and
one empty drum.
Satellite Accumulation of 126 lbs of waste.

Sep 17, 1997

Ashland Chemical, Maleic Anhydride
Neal plant, Neal plant



ASHLAND CHEMICAL MALEIC ANHYDRIDE PLANT
NEAL, WV

Sep 17, 1997

The end product, MALEIC ANHYDRIDE loading
station. A steam blow down is circled
in the lower middle section of the
photo

J L Bailey

ASHLAND CHEMICAL MALEIC ANHYDRIDE PLANT
NEAL, WV Sep 17, 1997.

Rail Road Tank car loading station.
Note stainless steel tray in middle
of tracks. This is plumbed to wastewater
sewer, and on to M-1411 pit.

J L Bailey

ASHLAND CHEMICAL, NEAL WV
MALEIC ANHYDRIDE PLANT
September 17, 1997

Rail Road Tank car Wash (INTERNAL)
Area. An infrequent practice.
Note stainless steel collection tray in
center of track. Also note discolored
gravel. Inadequate containment.

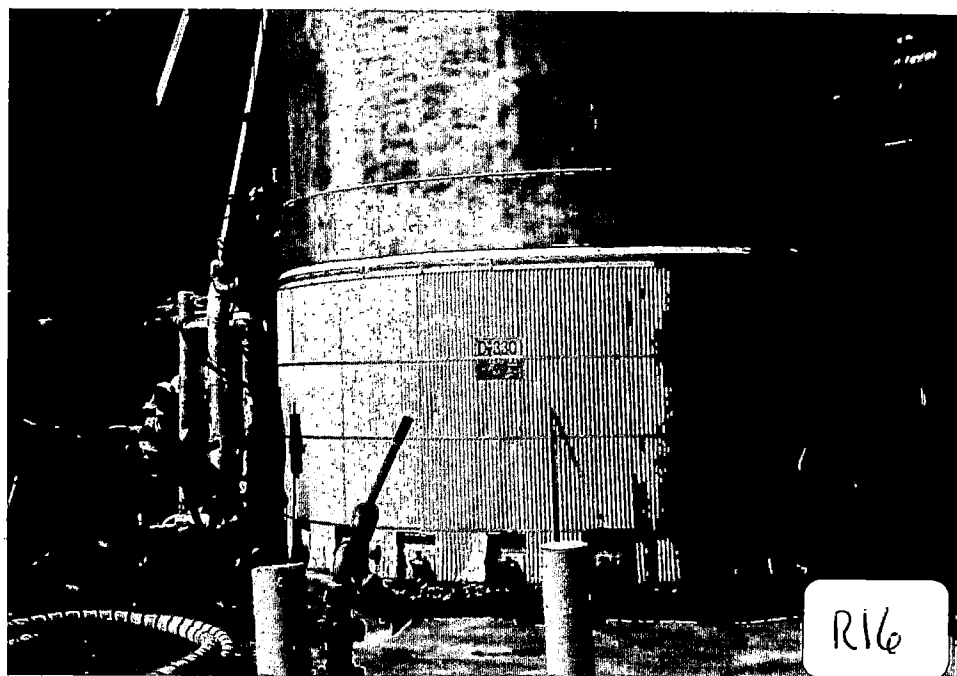
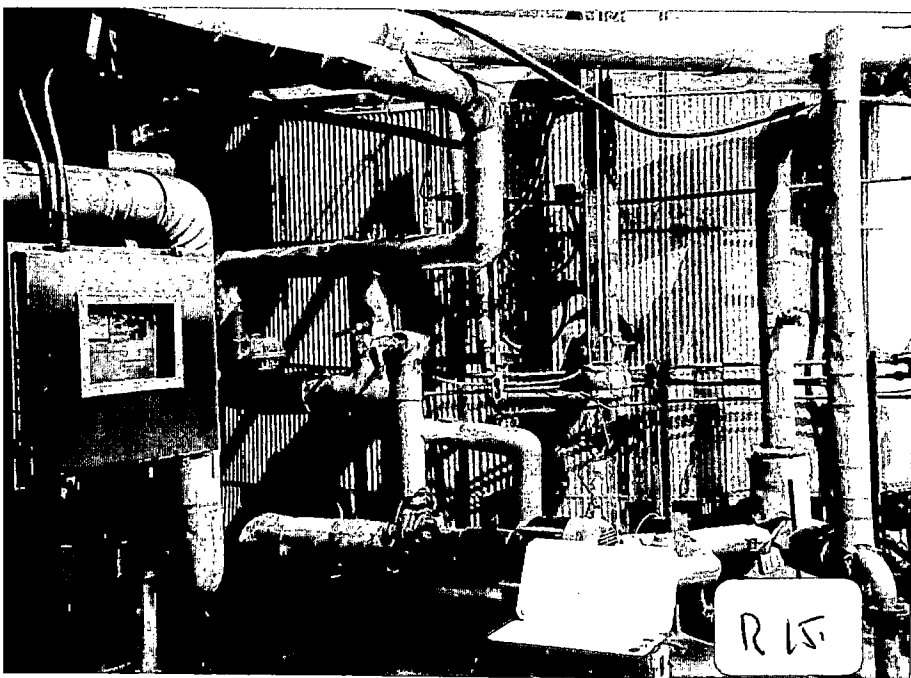
J L Bailey

Ashland Chemical Maleic Anhydride plant
Neal, WV. Sep 17, 1997

Rail Road Tank car loading station.
Note discolored gravel which indicates
spillage.

Containment should cover both sides
of RR track.

J L Bailey



ASHLAND CHEMICAL MALEIC ANHYDRIDE PLT
NEAL WV

SEP 17, 1997

The Maleic anhydride (Product) Sample
location. Note ~~samples~~ are labelled to
match the maleic anhydride Sample
Purge, the maleic anhydride Purge
is dumped into M-1411 pit periodically.

J L Bailey

Ashland Chemical, Maleic Anhydride
Plant, Neal, WV Sep 16, 1997

TANK 330 - the Abatement Scrubber.

J L Bailey

ASHLAND CHEMICAL, MALEIC ANHYDRIDE
Plant, NEAL, WV Sep 17, 1997

M-1411 Basin.

CONTAMINATED RUN OFF collection.

The 5 gal buckets of Purge maleic
Anhydride are dumped here.

J L Bailey

Ashland Chemical, Maleic Anhydride
Plant, NEAL, WV Sep 16, 1997.

The Abatement Scrubber Sample Point
Identified as 330 (TANK number).
Contents are pH adjusted and pumped
across the Big Sandy River to the
Ashland Petroleum WWT

J L Bailey

DOCUMENT REQUEST FORM
ASHLAND CHEMICAL MALEIC ANHYDRIDE PLANT
NEAL WEST VIRGINIA
(For use with any agency inspection)

1. Inspector:

JAMES L. Bailey

2. Agency:

USEPA

3. Document Requested:

August Shipments of Non Regulated Liquid Waste

4. Date Requested:

9-17-97

5. Document Delivered By:

Ashland Chemical

6. Date and Time Received:

9-17-97

3:20pm

7. Document Received By:

8. Document Returned To:

9. Date and Time Returned:

10. Notes:

**ASHLAND CHEMICAL
NEAL PLANT
AUGUST 1997 WASTE SHIPMENTS**

| DATE SHIPPED | B/L | POUNDS | CARRIER | FACILITY |
|--------------|-------------|--------|----------|---------------|
| 8/2/97 | 014562-6129 | 42,620 | MANFREDI | ALLWASTE |
| 8/2/97 | 014562-6130 | 42,880 | MANFREDI | ALLWASTE |
| 8/2/97 | 014562-6131 | 42,800 | MANFREDI | ALLWASTE |
| 8/4/97 | 014562-3301 | 44,760 | MANFREDI | CLEAN HARBORS |
| 8/5/97 | 014562-3302 | 44,840 | MANFREDI | CLEAN HARBORS |
| 8/5/97 | 014562-0231 | 44,680 | MANFREDI | WASTE MGNT. |
| 8/10/97 | 014562-6132 | 45,460 | MANFREDI | ALLWASTE |
| 8/10/97 | 014562-6133 | 45,040 | MANFREDI | ALLWASTE |
| 8/10/97 | 014562-6134 | 45,320 | MANFREDI | ALLWASTE |
| 8/10/97 | 014562-6135 | 45,500 | MANFREDI | ALLWASTE |
| 8/10/97 | 014562-6136 | 45,320 | MANFREDI | ALLWASTE |
| 8/10/97 | 014562-6137 | 45,340 | MANFREDI | ALLWASTE |
| 8/15/97 | 014562-0232 | 45,660 | MANFREDI | WASTE MGNT. |
| 8/17/97 | 014562-6138 | 46,000 | MANFREDI | ALLWASTE |
| 8/17/97 | 014562-6139 | 44,280 | MANFREDI | ALLWASTE |
| 8/17/97 | 014562-6140 | 45,300 | MANFREDI | ALLWASTE |
| 8/19/97 | 014562-6141 | 42,240 | MANFREDI | ALLWASTE |
| 8/19/97 | 014562-6142 | 48,920 | MANFREDI | ALLWASTE |
| 8/19/97 | 014562-6143 | 46,540 | MANFREDI | ALLWASTE |
| 8/21/97 | 014562-3303 | 46,300 | MANFREDI | CLEAN HARBORS |
| 8/24/97 | 014562-6144 | 45,020 | MANFREDI | ALLWASTE |
| 8/24/97 | 014562-6145 | 45,100 | MANFREDI | ALLWASTE |
| 8/24/97 | 014562-6146 | 45,240 | MANFREDI | ALLWASTE |
| 8/24/97 | 014562-6147 | 46,940 | MANFREDI | ALLWASTE |
| 8/24/97 | 014562-6148 | 44,480 | MANFREDI | ALLWASTE |
| 8/24/97 | 014562-6149 | 47,500 | MANFREDI | ALLWASTE |
| 8/26/97 | 014562-0233 | 44,880 | MANFREDI | WASTE MGNT. |

| <u>Facility</u> | <u>No. of Loads</u> | <u>Pounds Shipped</u> |
|-----------------|---------------------|-----------------------|
| All Waste | 21 | 947,840 |
| Clean Harbors | 3 | 135,900 |
| Waste Mgnt. | 3 | 135,220 |
| Total | 27 LOADS = | 1,218,960 |

DOCUMENT REQUEST FORM
ASHLAND CHEMICAL MALEIC ANHYDRIDE PLANT
NEAL WEST VIRGINIA
(For use with any agency inspection)

1. Inspector:

James L. Bailey

2. Agency:

USEPA

3. Document Requested:

Bill of Lading for Non Regulated liquid waste / MSDS

4. Date Requested:

9-17-97

5. Document Delivered By:

Ashland Chemical

6. Date and Time Received:

9-17-97

3:35pm

7. Document Received By:

8. Document Returned To:

9. Date and Time Returned:

10. Notes:

| | | | | |
|---|-----------------------------------|--|--|---|
| CONSIGNEE (STREET ADDRESS) Ashland Chemical Company Big Sandy River Road Neal, WV 25530 | | CONSIGNEE TO: (STREET ADDRESS) Allwaste Recovery Systems 1291 West Mound Street Columbus, OH 43223 | | SHIP DATE 09/02/97 |
| CARRIER / ROUTE Manfredi | | SCAC | C. O. D. SHIPMENT | BILL OF LADING NUMBER |
| SUBJECT TO CONTRACT NO. | SHIPMENT MODE Tanktruck | SHIPPING CHARGES ARE TO BE: Prepaid | C. O. D. Amount Collection Fee Total Charges | CUSTOMER P.O. NO. 014562-6150 |
| This shipment is delivered to the consignee without recourse on the consignor. The carrier shall not make delivery of the shipment without payment of freight and all other lawful charges. | | | | |

Every spill, release or incident involving Ashland Chemical Company products MUST be reported to CHEMTREC, day or night, at 800-424-9

| TYPE/NO. PACKAGES | HM | DESCRIPTION OF ARTICLES | SHIPPER'S WEIGHT (Sub. to Correction) | PRODUCT CODE |
|-------------------|----|--|---------------------------------------|--------------|
| 1 TT | | NON-RCRA REGULATED LIQUID WASTE MATERIAL SAFETY DATA SHEET ATTACHED Deliver 09/03/97 at 8:00 a.m. <div style="text-align: center;"> LAB REL <u> </u> PH <u>3.6</u> </div> | 74000 31500 <hr/> 42500 | |

SPECIAL INSTRUCTIONS

TOTAL SHIPPING WEIGHT

CARRIER APPROVES LOAD SECUREMENT
 CARRIER OFFERED REQUIRED PLACARDS
 EMERGENCY RESPONSE INFORMATION PRESENT
 AGENT / PER:

CARRIER NOTE: IF THIS SHIPMENT IS DELAYED ENROUTE FOR ANY REASON NOTIFY SHIPPER IMMEDIATELY

FREIGHT BILLS MUST SHOW BILL OF LADING NUMBER. MAIL ORIGINAL FREIGHT BILL AND COPY OF B/L TO:

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Receiver states that product matches Receiver's order and is in good condition. For bulk deliveries, hose connections are proper and sufficient space is available for delivery.

SHIPPER / PER

RECEIVER / PER

Signed:

Signed:



STANDARD PROCEDURE INSTRUCTION

| | | | | |
|---|-----------------------|--------------------------|--------------------------|------------|
| SUBJECT *Waste Acid Loading | | | S.P.I. NUMBER OI 1703 | |
| DEPARTMENT Ashland Chemical Company Neal Plant | | | PAGE 2 of 4 | |
| EFFECTIVE DATE 2/22/95 | SUPERSEDES 9/10/94 | DATE PREPARED 8/13/94 | PREPARED BY G. Earl | ATTACHMENT |

WASTE ACID TANKWAGON LOADING CHECKLIST

DATE: 9-1-97

- ☒ 1. Carrier, Tractor No., Trailer No. MacRED; 1327, 16679.
- ☒ 2. Has the waste acid PH been checked since last neutralized? List PH obtained 3.4.
- ☒ 3. Is the tank due for a visual inspection which is required every two years? (This should be indicated on the tank itself in front or front passenger side of tank.) If yes, do not load until inspection has been made.
- ☒ 4. Is the tank truck's loading connection positioned over the raised pad area at the loading station?
- ☒ 5. Is the tractor engine shut off and is the driver and other personnel clear of the area?
- ☒ 6. Is the hand brake set?
- ☒ 7. Is the tankwagon chocked?
- ☒ 8. Are the ground clip and Scully ground jack properly attached? Is the Scully grounding system showing green indicator? If Scully ground jack is not installed on the truck, fill out a Deficiency Report.
- ☒ 9. Are the internal and external unloading valves closed? Check for presence of debris in the outlet pipe and remove any that is found. The presence of Maleic Anhydride or waste acid in this pipe is acceptable.

*INDICATES CHANGE

APPROVED BY

APPROVED BY

APPROVED BY



STANDARD PROCEDURE INSTRUCTION

| | | | | |
|---|-----------------------|--------------------------|--------------------------|------------|
| SUBJECT *Waste Acid Loading | | | S.P.I. NUMBER OI 1703 | |
| DEPARTMENT Ashland Chemical Company Neal Plant | | | PAGE 3 of 4 | |
| EFFECTIVE DATE 2/22/95 | SUPERSEDES 9/10/94 | DATE PREPARED 8/13/94 | PREPARED BY G. Earl | ATTACHMENT |

- 10. Are the cleanout caps on top of the tankwagon closed?
- 11. Location of emergency shut off valve on trailer found?
- 12. Is the manway gasket in good condition?
- 13. Connect the waste acid load hose to the loading connection on the tank truck. Secure the loading fitting ears with wire to prevent hose removal. Inspect hose for defects. Partially open the main manual loading block valve.
- 14. For cold weather loading operation, put steam onto tracing for internal valve area.
- 15. Open the external valve first and then the internal valve. Switch the electric solenoid's switch to open the automatic load valve and close the recirculation valve. Fully open the loading block valve once acceptable flow is established.
- 16. Load the tankwagon.
- 17. Check the volume loaded, by dip measurement or load meter measurement (if available) *AE*
- 18. After loading, has the tankwagon been sampled and analyzed and does it meet disposal specifications? (Disposal specifications are: 3.0 - 3.5 PH - tank trucks being shipped immediately for disposal. 5.0 - 5.5 PH - tank trucks being held prior to shipment for disposal.) Drain hose to M 1410 tank trough. Disconnect loading hose.
- 19. All tankwagon placards must be removed. Wash any spilled material to the pit trough with condensate. Disconnect any steam hoses connected and purge heating coil with N₂ if winter conditions exist.

*INDICATES CHANGE

APPROVED BY

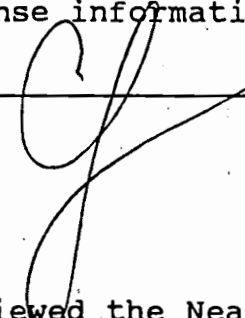
APPROVED BY

APPROVED BY

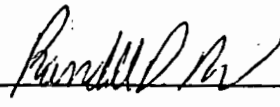


STANDARD PROCEDURE INSTRUCTION

| | | | | |
|---|-----------------------|--------------------------|--------------------------|------------|
| SUBJECT *Waste Acid Loading | | | S.P.I. NUMBER OI 1703 | |
| DEPARTMENT Ashland Chemical Company Neal Plant | | | PAGE 4 of 4 | |
| EFFECTIVE DATE 2/22/95 | SUPERSEDES 9/10/94 | DATE PREPARED 8/13/94 | PREPARED BY G. Earl | ATTACHMENT |

- ☐ 20. Install valve cap on unloading nozzle.
- ☐ 21. Are the ground clip and Scully System disconnected?
- ☐ 22. Is the wheel chock removed and stored?
- ☐ 23. Was the tankwagon weighed out?
- ☐ 24. Has the Deficiency Report been attached to Ashland's copy of the weigh bill reporting all mechanical or Ashland's cleanliness problems with this tank truck?
- ☐ 25. Has driver initialed for load securement, and presence of emergency response information?
- ☐ 26. Pumper's initials 

Truck Driver Section

- ☐ 1. Truck driver has viewed the Neal Plant video for truck drives on handling and transporting waste maleic acid.
- ☐ 2. Truck driver has read the Material Safety Data Sheet on waste maleic acid.
- ☐ 3. Truck driver's signature: 

Revised by Glenn Earl, Pat Shannon

*INDICATES CHANGE

APPROVED BY

APPROVED BY

APPROVED BY

Ashland Chemical Co.

Page 001

Date Prepared: 01/0

Date Printed: 12/0

MSDS No: 0217506-00

MALEIC ACID PROCESS WASTE NEUTRALIZED

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

Material Identity

Product Name: MALEIC ACID PROCESS WASTE NEUTRALIZED

General or Generic ID: NEUTRALIZED PROCESS WASTE

Company

Ashland Chemical Co.
P.O. Box 2219
Columbus, OH 43216
614-790-3333

Emergency Telephone Number:

1-800-ASHLAND (1-800-274-5263)
24 hours everyday

Regulatory Information Number:

1-800-325-3751

2. COMPOSITION/INFORMATION ON INGREDIENTS

| Ingredient(s) | CAS Number | % (by weight) |
|------------------|------------|---------------|
| WATER | 7732-18-5 | 82.0- 86.0 |
| ACETIC ACID | 64-19-7 | 1.0- 3.0 |
| MALEIC ACID | 110-16-7 | 1.0- 3.3 |
| FUMARIC ACID | 110-17-8 | 11.0- 15.0 |
| ACRYLIC ACID | 79-10-7 | 1.0- 1.1 |
| UNKNOWN MATERIAL | | 1.0- 2.5 |

3. HAZARDS IDENTIFICATION

Potential Health Effects

Eye

Exposure can cause eye irritation. Symptoms may include stinging, tearing, redness, and swelling.

Skin

Exposure can cause skin irritation. Symptoms may include redness, burning, skin damage.

Swallowing

Single dose oral toxicity is low. Swallowing small amounts during normal handling is not likely to cause harmful effects; swallowing large amounts may be harmful.

Inhalation

Exposure to vapor or mist is possible.

Symptoms of Exposure

gastrointestinal irritation (nausea, vomiting, diarrhea), irritation (nose, throat, respiratory tract).

Target Organ Effects

No data

Continued on next page

Ashland Chemical Co.

Page 003

Date Prepared: 01/0

Date Printed: 12/0

MSDS No: 0217506-00

MALEIC ACID PROCESS WASTE NEUTRALIZED

Fire and Explosion Hazards

Never use welding or cutting torch on or near drum (even empty) because product (even just residue) can ignite explosively.

Extinguishing Media

No data

Fire Fighting Instructions

Wear a self-contained breathing apparatus with a full facepiece operated in positive pressure demand mode with appropriate turn-out gear and chemical resistant personal protective equipment. Refer to the personal protective equipment section of this MSDS.

NFPA Rating

Not determined

6. ACCIDENTAL RELEASE MEASURES**Small Spill**

Absorb liquid on vermiculite, floor absorbent or other absorbent material.

Large Spill

Prevent run-off to sewers, streams or other bodies of water. If run-off occurs, notify proper authorities as required, that a spill has occurred. Persons not wearing protective equipment should be excluded from area of spill until clean-up has been completed. Stop spill at source, dike area of spill to prevent spreading, pump liquid to salvage tank. Remaining liquid may be taken up on sand, clay, earth, floor absorbent, or other absorbent material and shoveled into containers.

7. HANDLING AND STORAGE**Handling**

Containers of this material may be hazardous when emptied. Since emptied containers retain product residues (vapor, liquid, and/or solid), all hazard precautions given in the data sheet must be observed.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION**Eye Protection**

Chemical splash goggles in compliance with OSHA regulations are advised; however, OSHA regulations also permit other type safety glasses. Consult your safety representative.

Skin Protection

Wear resistant gloves such as: neoprene, To prevent repeated or prolonged skin contact, wear impervious clothing and boots..

Respiratory Protections

If workplace exposure limit(s) of product or any component is exceeded (see exposure guidelines), a NIOSH/MSHA approved air supplied respirator is advised in absence of proper environmental control. OSHA regulations also permit other NIOSH/MSHA respirators (negative pressure type) under specified conditions (see your industrial hygienist). Engineering or administrative controls should be implemented to reduce exposure.

Continued on next page

Ashland Chemical Co.

Page 005

Date Prepared: 01/03

Date Printed: 12/04

MSDS No: 0217506-003

MALEIC ACID PROCESS WASTE NEUTRALIZED

State

LIQUID

Physical Form

No data

Color

No data

Odor

No data

pH

2.5 - 5.0

10. STABILITY AND REACTIVITY

Hazardous Polymerization

Product will not undergo hazardous polymerization.

Hazardous Decomposition

May form: carbon dioxide and carbon monoxide, various hydrocarbons.

Chemical Stability

Stable.

Incompatibility

Avoid contact with: strong oxidizing agents.

11. TOXICOLOGICAL INFORMATION

No data

12. ECOLOGICAL INFORMATION

No data

13. DISPOSAL CONSIDERATION

Waste Management Information

Dispose of in accordance with all applicable local, state and federal regulations.

14. TRANSPORT INFORMATION

DOT Information - 49 CFR 172.101

DOT Description:

No data

Continued on next page

Laboratory Results - RCRA - Ashland Chemical, Neal Plant
D330 Vessel - Discharge to Refinery

| <i>Parameter</i> | <i>Limit</i> | <i>Result</i> |
|------------------|------------------|--|
| Corrosivity | pH <2.0 or >12.5 | pH = 11.54 - Not Corrosive |
| Ignitability | | "...not ignitable under conditions set forth in 40CFR261.21" |
| Reactivity | | "Cyanide < 0.05 mg/L. The sample is not reactive." |

DOCUMENT REQUEST FORM
ASHLAND CHEMICAL MALEIC ANHYDRIDE PLANT
NEAL WEST VIRGINIA
(For use with any agency inspection)

1. Inspector:

James L. Bailey

2. Agency:

USEPA

3. Document Requested:

Waste Profiles & Annual Report

4. Date Requested:

9-17-97

5. Document Delivered By:

6. Date and Time Received:

7. Document Received By:

8. Document Returned To:

9. Date and Time Returned:

10. Notes:

**ASHLAND CHEMICAL COMPANY
NEAL, WV
WASTE PROFILES**

Non-Regulated

| | |
|---------------|------------------------------|
| ASH 04 - 1398 | Catalyst Change Waste |
| ASH 04 - 2392 | Waste Oil, Rags & Absorbents |
| ASH 04 - 5857 | Maleic Rinse Water |
| ASH 04 - 6030 | Concrete/Asphalt |
| ASH 04 - 7116 | Spent Desiccant |
| ASH 04 - 7119 | Sandblasting waste |

Hazardous Waste

| | |
|---------------|--|
| ASH 04 - 5067 | Activated Spent Carbon & Trimethyl phosphite |
| ASH 04 - 5097 | Waste Heat Transfer Salt & Insulation |
| ASH 04 - 5482 | Waste Heat Transfer Salt |
| ASH 04 - 5680 | Maleic Anhydride (Lab product retains) |
| ASH 04 - 5739 | Fluorescent Light Bulbs |
| ASH 04 - 5744 | Paint with Lead |
| ASH 04 - 5888 | Parts Cleaner - Waste 140 Solvent |
| ASH 04 - 5905 | Waste Xylene (Seal from F-414 Floating Roof) |
| ASH 04 - 5970 | Maleic Anhydride & Insulation |
| ASH 04 - 6061 | PCB Ballast |
| ASH 04 - 6067 | Triethyl Phosphite (Unused Product) |

DOCUMENT REQUEST FORM
ASHLAND CHEMICAL MALEIC ANHYDRIDE PLANT
NEAL WEST VIRGINIA
(For use with any agency inspection)

1. Inspector: Bailey
2. Agency: USEPA
3. Document Requested: 94-95 HAZ. WST. Report
4. Date Requested: 9-18-97
5. Document Delivered By: Tara
6. Date and Time Received: 9/18/97 955 am
7. Document Received By: _____
8. Document Returned To: _____
9. Date and Time Returned: _____
10. Notes: _____

Petrochemical Division
Maleic Anhydride Plant
Neal, West Virginia
(304) 453-6101

Ashland Chemical Company
Division of
Ashland Oil, Inc.

Address Reply:
Neal Plant
P.O. Box 391
Ashland, KY 41114
Fax: (606) 921-6732

February 27, 1996

West Virginia DEP
Office of Waste Management
1356 Hansford Street
Charleston, WV 25701

Subject: 1995 Hazardous Waste Report
Ashland Chemical Company
Neal, WV 25530
WVD080645831

Dear Sir/Madam:

Enclosed is a copy of the West Virginia Hazardous Waste Report for 1995. Should you have any questions, or need clarification about this report, please call me at (304) 453-6101.

Sincerely,

ASHLAND CHEMICAL COMPANY

Harold N. Hicks, Jr.
Harold N. Hicks, Jr.
Plant Manager

HNH/jn

Enclosure

cc: D. Gebhardt
K. Long
File: WV Hazardous Waste Activity Report 1994-95



Ashland Chemical's
Commitment to
Quality and Productivity

Headquarters:
5200 Blazer Parkway
Dublin, Ohio 43017
(614) 889-3333

Cable Address: Aroplaz OH
Telex: 245385
Answerback: ASHCHEM
Fax: (614) 889-4119



A Responsible Care
Company

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Ashland Chemical Company
Neal PlantEPA ID NO: W V D 0 8 0 6 4 5 8 3 1U.S. ENVIRONMENTAL
PROTECTION AGENCY

1995 Hazardous Waste Report

FORM
ICIDENTIFICATION AND
CERTIFICATION

INSTRUCTIONS: Read the detailed instructions beginning on page 9 of the 1995 Hazardous Waste Report booklet before completing this form.

Sec. I Site name and location address. Complete A through H. Check the box ☐ in items A, C, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instruction page 10.

| | | |
|--|--|---|
| A. EPA ID No. Same as label <input type="checkbox"/> or → <u>W V D 0 8 0 6 4 5 8 3 1</u> | | B. County <u>Wayne</u> |
| C. Site/company name Same as label <input type="checkbox"/> or → <u>Ashland Chemical Company</u> <u>Neal Plant</u> | | D. Has the site name associated with this EPA ID changed since 1993? <input type="checkbox"/> 1 Yes <input checked="" type="checkbox"/> 2 No |
| E. Street name and number. If not applicable, enter industrial park, building name, or other physical location description. Same as label <input type="checkbox"/> or → <u>Big Sandy River Road</u> | | |
| F. City, town, village, etc. Same as label <input type="checkbox"/> or → <u>Neal</u> | G. State Same as label <input type="checkbox"/> or → <u>W V</u> | H. Zip Code Same as label <input type="checkbox"/> or → <u>2 5 5 3 0</u> |

Sec. II Mailing address of site. Instruction page 10.

| | | |
|---|------------------------|---------------------------------|
| A. Is the mailing address the same as the location address? <input type="checkbox"/> 1 Yes (SKIP TO SEC. III) <input checked="" type="checkbox"/> 2 No (GO TO BOX B) | | |
| B. Number and street name of mailing address <u>P. O. Box 391</u> | | |
| C. City, town, village, etc. <u>Ashland</u> | D. State <u>K Y</u> | E. Zip Code <u>4 1 1 1 4</u> |

Sec. III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instruction page 10.

| | | | | |
|---|--|--|-------------------------------------|---|
| A. Please print: Last Name First name M.I. <u>Long Kara B.</u> | | | B. Title <u>Process Engineer</u> | C. Telephone <u>3 0 4 4 5 3 6 1 0 1</u> Extension <u> </u> |
|---|--|--|-------------------------------------|---|

Sec. IV "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties under Section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations."

| | | | |
|---|--|--|--|
| A. Please print: Last Name First name M.I. <u>Hicks, Jr. Harold N.</u> | | | B. Title <u>Plant Manager</u> |
| C. Signature <u>Harold N. Hicks, Jr.</u> | | | D. Date of signature <u>02 27 96</u> MO. AND DAY AND YR. |

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME Ashland Chemical Company
Neal Plant

EPA ID NO WV D 0 8 0 6 4 5 8 3 1



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1995 Hazardous Waste

FORM
GM

WASTE GENERATION
AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description - Instruction page 18.

Lead paint stripped off of handrails.

B. EPA hazardous waste code Page 19.

D 0 0 8 N A

C. State hazardous waste code Page 19.

N A

D. SIC code Page 19.

2 8 6 5

E. Origin code 1 Page 19

System

Type M

F. Source code Page 20.

A 0 1

G. Point of measurement

Page 20.

1

H. Form code

Page 20.

B 3 1 9 *

I. RCRA - radioactive mixed

Page 20.

2

Sec. II

A. Quantity generated in 1994
Instruction Page 21.

B. Quantity generated in 1995
Page 21.

C. UOM
Page 21.

Density

1

0 0 0

☐ 1 lbs/gal ☐ 2 sg

D. Did this site do any of the following to this waste, dispose on site, recycle on site, or discharge sewer/POTW? Page 21.

☐ 1 Yes (CONTINUE TO SYSTEM 1)

☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type
Page 22.

M

Quantity treated, disposed, or recycled on site
in 1995

0 0 0 0 0 0 0 0 0 0

ON-SITE PROCESS SYSTEM 2

On-site process system type
Page 22.

M

Quantity treated, disposed, or recycled on site
in 1995

0 0 0 0 0 0 0 0 0 0

Sec. III

A. Was any of this waste shipped off-site in 1995
Instruction page 22.

☒ 1 Yes (CONTINUE TO BOX B)

☐ 2 No (SKIP TO SEC IV)

Site 1

B. EPA ID No. of facility waste was shipped to
Page 23.

A R D 9 8 1 0 5 7 8 7 9

C. System type shipped to
Page 23.

M 0 6 1

D. Off-site
availability code
Page 23.

1

E. Total quantity shipped in 1995
Page 23.

1 0 0

Site 2

B. EPA ID No. of facility waste was shipped to
Page 23.

N A

C. System type shipped to
Page 23.

M

D. Off-site
availability code
Page 23.

1

E. Total quantity shipped in 1995
Page 23.

0 0 0 0 0 0 0 0 0 0

Sec. IV

A. Did new activities in 1995 result in minimization of this waste? ☐ 1 Yes (CONTINUE TO BOX B)

Instruction page 24.

☐ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.

W W

W W

C. Other effects Page 25.

☐ 1 Yes

☐ 2 No

D. Quantity recycled in 1995 due to new activities
Page 25.

0 0 0 0 0 0 0 0 0 0

E. Activity/production
index Page 25.

0 0 0 0 0 0 0 0 0 0

F. 1995 source reduction quantity Page 25.

0 0 0 0 0 0 0 0 0 0

Comments:

* Paint containing lead stripped from a surface.

BEFORE COPYING FORM ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME Ashland Chemical Company
Neal Plant
 EPA ID NO W V D 0 8 0 6 4 5 8 3 1



U.S. ENVIRONMENTAL
 PROTECTION AGENCY

1995 Hazardous Waste

FORM
 GM

WASTE GENERATION
 AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description - Instruction page 18.

Used light bulbs containing mercury.

B. EPA hazardous waste code Page 19.

D 0 0 9 N A

C. State hazardous waste code Page 19.

N A

D. SIC code Page 19.

2 8 6 5

E. Origin code 1 Page 19
 System
 Type M

F. Source code Page 20.

A 9 9*

G. Point of measurement
 Page 20.

1

H. Form code
 Page 20.

B 3 1 9 **

I. RCRA - radioactive mixed Page 20.

2

Sec. II

A. Quantity generated in 1994
 Instruction Page 21.

0 0

B. Quantity generated in 1995
 Page 21.

2 0 0 0

C. UOM
 Page 21.

1 0 0 0
☐ 1 lbs/gal ☐ 2 sg

D. Did this site do any of the following to this waste, dispose on site, recycle on site, or discharge sewer/POTW? Page 21.

☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type
 Page 22.

M

Quantity treated, disposed, or recycled on site
 in 1995

0 0 0 0

ON-SITE PROCESS SYSTEM 2

On-site process system type
 Page 22.

M

Quantity treated, disposed, or recycled on site
 in 1995

0 0 0 0

Sec. III

A. Was any of this waste shipped off-site in 1995 ☒ 1 Yes (CONTINUE TO BOX B)
 Instruction page 22. ☐ 2 No (SKIP TO SEC. IV)

Site 1

B. EPA ID No. of facility waste was shipped to
 Page 23.

O H D 0 0 0 8 1 6 6 2 9

C. System type shipped to
 Page 23.

M 1 3 2

D. Off-site availability code
 Page 23.

1

E. Total quantity shipped in 1995
 Page 23.

2 0 0

Site 2

B. EPA ID No. of facility waste was shipped to
 Page 23.

N A

C. System type shipped to
 Page 23.

M

D. Off-site availability code
 Page 23.

1

E. Total quantity shipped in 1995
 Page 23.

0 0 0

Sec. IV

A. Did new activities in 1995 result in minimization of this waste? ☐ 1 Yes (CONTINUE TO BOX B)
 Instruction page 24. ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.

W W
W W

C. Other effects Page 25.

☐ 1 Yes
☐ 2 No

D. Quantity recycled in 1995 due to new activities
 Page 25.

0 0 0 0

E. Activity/production
 index Page 25.

0 0

F. 1995 source reduction quantity Page 25.

0 0 0 0

Comments:

* Routine changing of light bulbs.
 ** Used light bulbs containing mercury.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME Ashland Chemical Company
Neal Plant
 EPA ID NO WVD, 08, 06, 4, 5, 8, 3, 1



U.S. ENVIRONMENTAL
 PROTECTION AGENCY

1995 Hazardous Waste

FORM
 GM

WASTE GENERATION
 AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.

| | | | | | |
|--|--|---|---|--|--|
| Sec. I A. Waste description - Instruction page 18. <u>Insulation contaminated with heat transfer because of leaks; the salt is classified as an oxidizer; mixture of potassium nitrate, sodium nitrate, and sodium nitrite.</u> | | | | | |
| B. EPA hazardous waste code Page 19. <u>D, 0, 0, 1</u> <u>D, 0, 0, 7</u> <u>N, A</u> | | | C. State hazardous waste code Page 19. <u>N, A</u> | | |
| D. SIC code Page 19. <u>2, 8, 6, 5</u> | E. Origin code Page 19. System <u>1</u> Type <u>LM</u> | F. Source code Page 20. <u>A, 5, 1</u> | G. Point of measurement Page 20. <u>3</u> | H. Form code Page 20. <u>B, 3, 1, 5</u> | I. RCRA - radioactive mixed Page 20. <u>2</u> |

| | | | |
|--|---|--|--|
| Sec. II A. Quantity generated in 1994 Instruction Page 21. <u>3, 4, 0, 0, 0, 0</u> | B. Quantity generated in 1995 Instruction Page 21. <u>0, 0</u> | C. UOM Page 21. <u>1</u> <u>0</u> <u>0</u> <u>0</u> <u>0</u> <u>0</u> <input type="checkbox"/> 1 lbs/gal <input type="checkbox"/> 2 sg | D. Did this site do any of the following to this site, dispose on site, recycle on site, or discharge sewer/POTW? Page 21. <input type="checkbox"/> 1 Yes (CONTINUE TO SYSTEM 1) <input checked="" type="checkbox"/> 2 No (SKIP TO SEC. III) |
| ON-SITE PROCESS SYSTEM 1 On-site process system type Page 22. <u>LM</u> Quantity treated, disposed, or recycled on site in 1995 <u>0, 0, 0, 0, 0, 0</u> | | ON-SITE PROCESS SYSTEM 2 On-site process system type Page 22. <u>LM</u> Quantity treated, disposed, or recycled on site in 1995 <u>0, 0, 0, 0, 0, 0</u> | |

| | | | | |
|---|---|--|---|--|
| Sec. III A. Was any of this waste shipped off-site in 1995 <input type="checkbox"/> 1 Yes (CONTINUE TO BOX B) Instruction page 22. <input checked="" type="checkbox"/> 2 No (SKIP TO SEC. IV) | | | | |
| Site 1 B. EPA ID No. of facility waste was shipped to Page 23. <u>0, 0, 0, 0, 0, 0</u> | C. System type shipped to Page 23. <u>LM</u> | D. Off-site availability code Page 23. <u>0</u> | E. Total quantity shipped in 1995 Page 23. <u>0, 0, 0, 0, 0, 0</u> | |
| Site 2 B. EPA ID No. of facility waste was shipped to Page 23. <u>0, 0, 0, 0, 0, 0</u> | C. System type shipped to Page 23. <u>LM</u> | D. Off-site availability code Page 23. <u>0</u> | E. Total quantity shipped in 1995 Page 23. <u>0, 0, 0, 0, 0, 0</u> | |

| | | | | | |
|--|--|--|--|---|--|
| Sec. IV A. Did new activities in 1995 result in minimization of this waste? <input type="checkbox"/> 1 Yes (CONTINUE TO BOX B) Instruction page 24. <input checked="" type="checkbox"/> 2 No (THIS FORM IS COMPLETE) | | | | | |
| B. Activity Page 24. <u>W</u> <u>W</u> <u>W</u> <u>W</u> | C. Other effects Page 25. <input type="checkbox"/> 1 Yes <input type="checkbox"/> 2 No | D. Quantity recycled in 1995 due to new activities Page 25. <u>0, 0, 0, 0, 0, 0</u> | E. Activity/production index Page 25. <u>0, 0, 0, 0, 0, 0</u> | F. 1995 source reduction quantity Page 25. <u>0, 0, 0, 0, 0, 0</u> | |

Comments:

FOR COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME Ashland Chemical Company
Neal Plant

EPA ID NO W V D 0 8 0 6 4 5 1 8 3 1



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1995 Hazardous Waste

FORM
GM

WASTE GENERATION
AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.

Sec. I A. Waste description - Instruction page 18. Spent carbon drums from the trimethyl phosph (TMP) system. TMP is classified as an ignitable waste.

B. EPA hazardous waste code Page 19.

D 0 0 1 N A

C. State hazardous waste code Page 19.

N A

D. SIC code Page 19.

2 8 6 5

E. Origin code Page 19

System
Type LM

F. Source code Page 20.

A 7 8

G. Point of measurement
Page 20.

1

H. Form code
Page 20.

B 4 0 4

I. RCRA - radioactive mixed Pa

2

Sec. II

A. Quantity generated in 1994
Instruction Page 21.

2 0 4 0 0

B. Quantity generated in 1995
Page 21.

0 0

C. UOM
Page 21.

1

☐ 1 lbs/gal ☐ 2 sg

Density

D. Did this site do any of the following to this site, dispose on site, recycle on site, or discharge sewer/POTW? Page 21.

☐ 1 Yes (CONTINUE TO SYSTEM 1)

☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type
Page 22.

LM

Quantity treated, disposed, or recycled on site
in 1995

0 0

ON-SITE PROCESS SYSTEM 2

On-site process system type
Page 22.

LM

Quantity treated, disposed, or recycled on site
in 1995

0 0

Sec. III

A. Was any of this waste shipped off-site in 1995 ☐ 1 Yes (CONTINUE TO BOX B)
Instruction page 22. ☒ 2 No (SKIP TO SEC. IV)

Site 1

B. EPA ID No. of facility waste was shipped to
Page 23.

0 0 0 0 0 0 0 0 0 0

C. System type shipped to
Page 23.

LM

D. Off-site
availability code
Page 23.

1

E. Total quantity shipped in 1995
Page 23.

0 0

Site 2

B. EPA ID No. of facility waste was shipped to
Page 23.

0 0 0 0 0 0 0 0 0 0

C. System type shipped to
Page 23.

LM

D. Off-site
availability code
Page 23.

1

E. Total quantity shipped in 1995
Page 23.

0 0

Sec. IV

A. Did new activities in 1995 result in minimization of this waste? ☐ 1 Yes (CONTINUE TO BOX B)
Instruction page 24. ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.

LW LW
LW LW

C. Other effects Page 25.

☐ 1 Yes

☐ 2 No

D. Quantity recycled in 1995 due to new activities
Page 25.

0 0

E. Activity/production
index Page 25.

0 0

F. 1995 source reduction quantity Page

0 0

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME

Ashland Chemical Company

Neal Plant

EPA ID NO

W V D 0 8 0 , 6 4 5 , 8 3 1



U.S. ENVIRONMENTAL PROTECTION AGENCY

1995 Hazardous Waste

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description - Instruction page 18.

Failed rubber seal contaminated with xylene; xylene is considered flammable

B. EPA hazardous waste code Page 19.

D1001 N/A

C. State hazardous waste code Page 19.

N/A

D. SIC code Page 19.

2865

E. Origin code Page 19

System Type LM

F. Source code Page 20.

A 9 9 *

G. Point of measurement Page 20.

3

H. Form code Page 20.

B 4 0 9 **

I. RCRA - radioactive mixed Page 20.

2

Sec. II

A. Quantity generated in 1994 Instruction Page 21.

4 0 0 0 . 0

B. Quantity generated in 1995 Page 21.

0 . 0

C. UQM Page 21.

1

1 lbs/gal 2 sg

Density

D. Did this site do any of the following to this waste, dispose on site, recycle on site, or discharge sewer/POTW? Page 21.

1 Yes (CONTINUE TO SYSTEM I)
2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type Page 22.

LM

Quantity treated, disposed, or recycled on site in 1995

ON-SITE PROCESS SYSTEM 2

On-site process system type Page 22.

LM

Quantity treated, disposed, or recycled on site in 1995

Sec. III

A. Was any of this waste shipped off-site in 1995 ☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (SKIP TO SEC IV)

Site 1

B. EPA ID No. of facility waste was shipped to Page 23.

C. System type shipped to Page 23.

LM

D. Off-site availability code Page 23.

E. Total quantity shipped in 1995 Page 23.

Site 2

B. EPA ID No. of facility waste was shipped to Page 23.

C. System type shipped to Page 23.

LM

D. Off-site availability code Page 23.

E. Total quantity shipped in 1995 Page 23.

Sec. IV

A. Did new activities in 1995 result in minimization of this waste? ☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.

W W
W W

C. Other effects Page 25.

1 Yes
2 No

D. Quantity recycled in 1995 due to new activities Page 25.

E. Activity/production index Page 25.

F. 1995 source reduction quantity Page 25.

Comments:

* Replacing seal on floating roof tank.

** Rubber contaminated with xylene; flammable solid.

SITE NAME Ashland Chemical Company
Neal Plant
EPA ID NO WVD 080 645 831



1995 Hazardous Waste

WASTE GENERATION
AND MANAGEMENT

FORM
GM

| | |
|--------|--|
| Sec. I | A. Waste description - Instruction page 18. Insulation contaminated with maleic anhydride; classified as corrosive. |
|--------|--|

D 0 0 2 U 1 4 7

N A

2, 8, 6, 5,

5 1

,3

Page 20.
1840.5

12

A. Quantity generated in 1994
Instruction Page 21.

B. Quantity generated in 1995
Page 21.

C. UOM
Page 21.

1 •

☐ 1 lbs/gal ☐ 2 sq

D. Did this site do any of the following to this waste, dispose on site, recycle on site, or discharge sewer/POTW? Page 21.

☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

ON-SITE PROCESS SYSTEM 2

On-site process system type
Page 22.

Quantity treated, disposed, or recycled on site
in 1995

LM

On-site process system type
Page 22.

LM

Quantity treated, disposed, or recycled on site
in 1995

lllllllll.

A. Was any of this waste shipped off-site in 1995 ☐ 1 Yes (CONTINUE TO BOX B)
Instruction page 22. ☒ 2 No (SKIP TO SEC IV)

Site 1

B. EPA ID No. of facility waste was shipped to
Page 23.

C. System type shipped to
Page 23.

D. Off-site availability code
Page 23.

E. Total quantity shipped in 1995
Page 23.

Site 2

B. EPA ID No. of facility waste was shipped to
Page 23.

C. System type shipped to
Page 23

D. Off-site availability code
Page 23.

E, Total quantity shipped in 1995
Page 23.

A. Did new activities in 1995 result in minimization of this waste? ☐ 1 Yes (CONTINUE TO BOX B)
Instruction page 24. ☒ 2 No (THIS FORM IS COMPLETE)

W W
W W

☐ 1 Yes

☐ 2 No

D. Quantity recycled in 1995 due to new activities

E. Activity/production
index Page 25.

F. 1995 source reduction quantity Page 2

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER

SITE NAME Ashland Chemical Company
Neal Plant

EPA ID NO WV D, 080, 645, 831



U.S. ENVIRONMENTAL
 PROTECTION AGENCY

1995 Hazardous Waste



WASTE GENERATION
 AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.

| | | | | | |
|--|---|---|--|---|---|
| Sec. I A. Waste description - Instruction page 18. Wastewater containing chromium generated from cleaning the reactor shell. | | | | | |
| B. EPA hazardous waste code Page 19. <u>D 0 0 7</u> <u>N A</u> | | | C. State hazardous waste code Page 19. <u>N A</u> | | |
| D. SIC code Page 19. <u>2 8 6 5</u> | E. Origin code <u>1</u> Page 19 System Type <u>LM</u> | F. Source code Page 20. <u>A 0 9</u> | G. Point of measurement Page 20. <u>1</u> | H. Form code Page 20. <u>B 1 1 4</u> | I. RCRA - radioactive mixed Page 20. <u>12</u> |

| | | | |
|--|---|--|---|
| Sec. II A. Quantity generated in 1994 Instruction Page 21. <u>8 3 6 2 0 . 0</u> | B. Quantity generated in 1995 Page 21. <u>0 . 0</u> | C. UOM Page 21. <u>1</u> <u> </u> <u> </u> <u> </u> <u> </u> <input type="checkbox"/> 1 lbs/gal <input type="checkbox"/> 2 sg | D. Did this site do any of the following to this waste? site, dispose on site, recycle on site, or discharge sewer/POTW? Page 21. <input type="checkbox"/> 1 Yes (CONTINUE TO SYSTEM I) <input checked="" type="checkbox"/> 2 No (SKIP TO SEC. III) |
| ON-SITE PROCESS SYSTEM 1 On-site process system type Page 22. <u>LM</u> | | ON-SITE PROCESS SYSTEM 2 On-site process system type Page 22. <u>LM</u> | |

| | | | | |
|---|---|--|--|--|
| Sec. III A. Was any of this waste shipped off-site in 1995 <input type="checkbox"/> 1 Yes (CONTINUE TO BOX B) Instruction page 22. <input checked="" type="checkbox"/> 2 No (SKIP TO SEC. IV) | | | | |
| Site 1 | B. EPA ID No. of facility waste was shipped to Page 23. <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> | C. System type shipped to Page 23. <u>LM</u> | D. Off-site availability code Page 23. <u> </u> | E. Total quantity shipped in 1995 Page 23. <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> |
| Site 2 | B. EPA ID No. of facility waste was shipped to Page 23. <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> | C. System type shipped to Page 23. <u>LM</u> | D. Off-site availability code Page 23. <u> </u> | E. Total quantity shipped in 1995 Page 23. <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> |

| | | | | | |
|--|--|---|---|---|--|
| Sec. IV A. Did new activities in 1995 result in minimization of this waste? <input type="checkbox"/> 1 Yes (CONTINUE TO BOX B) Instruction page 24. <input checked="" type="checkbox"/> 2 No (THIS FORM IS COMPLETE) | | | | | |
| B. Activity Page 24. <u>LM</u> <u>LM</u> <u>LM</u> <u>LM</u> | C. Other effects Page 25. <input type="checkbox"/> 1 Yes <input type="checkbox"/> 2 No | D. Quantity recycled in 1995 due to new activities Page 25. <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> | E. Activity/production index Page 25. <u> </u> <u> </u> <u> </u> <u> </u> | F. 1995 source reduction quantity Page 25. <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> | |

Comments: REACTOR SHELL WASHED OUT PRIOR TO SHIPMENT TO LOCAL
 SCRAP YARD FOR CUTTING UP AND RECYCLE

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Ashland Chemical Company
Neal Plant

EPA ID NO: W V D 0 8 0 6 4 5 8 3 1



U.S. ENVIRONMENTAL
 PROTECTION AGENCY

1995 Hazardous Waste Re

FORM
 GM

WASTE GENERATION
 AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.

| | | | | | |
|--|---|---|--|---|--|
| Sec. I A. Waste description - Instruction page 18. Corrosive material from stillpot washing operation; neutralize mixture of maleic acid and fumaric acid. | | | | | |
| B. EPA hazardous waste code Page 19. <u>D 0 0 2</u> * <u>N A</u> | | | C. State hazardous waste code Page 19. <u>N A</u> | | |
| D. SIC code Page 19. <u>2 8 6 5</u> | E. Origin code Page 19 System <u>LMN A</u> Type | F. Source code Page 20. <u>A 0 9</u> | G. Point of measurement Page 20. <u>1</u> | H. Form code Page 20. <u>B 2 0 7</u> | I. RCRA - radioactive mixed Page <u>2</u> |

| | | | | | | | |
|--|--|--|--|--|--|--|--|
| Sec. II A. Quantity generated in 1994 Instruction Page 21. <u>1 9 0 1 5 0 6 0 . 0</u> | | B. Quantity generated in 1995 Page 21. <u>1 8 3 1 6 5 0 4 . 0</u> | | C. UOM Density Page 21. <u>1</u> <u>1 1 . 0 0</u> <input checked="" type="checkbox"/> 1 lbs/gal <input type="checkbox"/> 2 sg | | D. Did this site do any of the following to this waste, dispose on site, recycle on site, or discharge to sewer/POTW? Page 21. <input checked="" type="checkbox"/> 1 Yes (CONTINUE TO SYSTEM 1) <input type="checkbox"/> 2 No (SKIP TO SEC. III) | |
| ON-SITE PROCESS SYSTEM 1 On-site process system type Page 22. <u>M 1 2 1</u> ** Quantity treated, disposed, or recycled on site in 1995 <u>1 8 3 1 6 5 0 4 . 0</u> | | | | ON-SITE PROCESS SYSTEM 2 On-site process system type Page 22. <u>M N A</u> Quantity treated, disposed, or recycled on site in 1995 | | | |

| | | | | |
|---|--|---|--|--|
| Sec. III A. Was any of this waste shipped off-site in 1995 <input type="checkbox"/> 1 Yes (CONTINUE TO BOX B) Instruction page 22. <input type="checkbox"/> 2 No (SKIP TO SEC IV) | | | | |
| Site 1 B. EPA ID No. of facility waste was shipped to Page 23. <u>Q H D 0 8 1 2 9 0 6 1 1</u> | C. System type shipped to Page 23. <u>M 0 8 1</u> | D. Off-site availability code Page 23. <u>1</u> | E. Total quantity shipped in 1995 Page 23. <u>1 7 7 8 3 8 0</u> | |
| Site 2 B. EPA ID No. of facility waste was shipped to Page 23. <u>Q H D 0 0 0 7 2 4 1 5 3</u> | C. System type shipped to Page 23. <u>M 0 8 1</u> | D. Off-site availability code Page 23. <u>1</u> | E. Total quantity shipped in 1995 Page 23. <u>1 6 2 1 9 6 8 4</u> | |

| | | | | | |
|--|---|---|---|---|--|
| Sec. IV A. Did new activities in 1995 result in minimization of this waste? <input checked="" type="checkbox"/> 1 Yes (CONTINUE TO BOX B) Instruction page 24. <input type="checkbox"/> 2 No (THIS FORM IS COMPLETE) | | | | | |
| B. Activity Page 24. <u>W 1 9</u> ** | C. Other effects Page 25. <input type="checkbox"/> 1 Yes <input checked="" type="checkbox"/> 2 No | D. Quantity recycled in 1995 due to new activities Page 25. <u>0</u> | E. Activity/production index Page 25. <u>1 . 2</u> | F. 1995 source reduction quantity Page 21 <u>4 5 0 1 5 6 8 0</u> | |

Comments:

- * Waste code before neutralization.
- ** Waste acid neutralized to above 2.0 pH via elementary neutralization.
- *** Increased washing operation efficiency.

Section III, Box B continued on a supplemental page.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Ashland Chemical Company
Neal Plant

EPA ID NO: W V D 0 8 0 6 4 5 8 3 1



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1995 Hazardous Waste

FORM
GM

WASTE GENERATION
AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 16 of the 1995 Hazardous Waste Report booklet before completing this form.

Sec. I A. Waste description - Instruction page 18.

B. EPA hazardous waste code Page 19.

C. State hazardous waste code Page 19.

D. SIC code Page 19.

E. Origin code Page 19

System

Type LM

F. Source code Page 20.

G. Point of measurement
Page 20.

H. Form code
Page 20.

I. RCRA - radioactive mixed Page

Sec. II A. Quantity generated in 1994
Instruction Page 21.

B. Quantity generated in 1995
Page 21.

C. UOM Density
Page 21.

D. Did this site do any of the following to this waste,
site, dispose on site, recycle on site, or discharge
sewer/POTW? Page 21.

☐ 1 Yes (CONTINUE TO SYSTEM 1)
☐ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

ON-SITE PROCESS SYSTEM 2

On-site process system type
Page 22.

Quantity treated, disposed, or recycled on site
in 1995

On-site process system type
Page 22.

Quantity treated, disposed, or recycled on site
in 1995

Sec. III

A. Was any of this waste shipped off-site in 1995 ☐ 1 Yes (CONTINUE TO BOX B)
Instruction page 22. ☐ 2 No (SKIP TO SEC IV)

Site 1

B. EPA ID No. of facility waste was shipped to
Page 23.

N A*

C. System type shipped to
Page 23.

M 1 3 2

D. Off-site
availability code
Page 23.

1

E. Total quantity shipped in 1995
Page 23.

3 1 8 1 4

Site 2

B. EPA ID No. of facility waste was shipped to
Page 23.

N A

C. System type shipped to
Page 23.

M

D. Off-site
availability code
Page 23.

E. Total quantity shipped in 1995
Page 23.

Sec. IV

A. Did new activities in 1995 result in minimization of this waste? ☐ 1 Yes (CONTINUE TO BOX B)
Instruction page 24. ☐ 2 No (THIS FORM IS COMPLETE)

B. Activity Page 24.

W W

W W

C. Other effects Page 25.

☐ 1 Yes

☐ 2 No

D. Quantity recycled in 1995 due to new activities
Page 25.

E. Activity/production
index Page 25.

F. 1995 source reduction quantity Page

Comments:

* Waste Management of Ohio, Inc.; Glenford, OH Permit ID#06-2102;
This facility does not have an EPA ID# because it does not handle
hazardous waste.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Ashland Chemical Company
Neal Plant

EPA ID NO: WVD 080645831



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1995 Hazardous Waste Report

FORM
PS

WASTE TREATMENT,
DISPOSAL, OR RECYCLING
PROCESS SYSTEMS

INSTRUCTIONS: Read the detailed instructions beginning on page 33 of the 1995 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste treatment, disposal, or recycling system description

Instruction Page 38. Elementary neutralization of D002 waste acid from vessel wash

B. System type
Page 38.

M 1 2 1

C. Regulatory status
Page 39.

0 8

D. Operational status
Page 39.

0 1

E. Unit types
Page 39.

0 1

Sec. II

A. 1995 influent quantity
Instruction page 40.

Total 1 8 3 1 6 5 0 4 . 0 UOM 1 Density 1
RCRA 1 8 3 1 6 5 0 4 . 0 ☐ 1 lbs/gal ☐ 2 sg

B. Maximum operational capacity
Page 41.

Total 3 1 9 3 0 2 . 0
RCRA 3 1 9 3 0 2 . 0

C. 1995 liquid effluent quantity
Instruction page 42.

Total 1 8 3 1 6 5 0 4 . 0 UOM 1 Density 1
RCRA 1 8 3 1 6 5 0 4 . 0 ☐ 1 lbs/gal ☐ 2 sg

D. 1995 solid/sludge residual quantity
Page 43.

Total N A UOM 1 Density 1
RCRA N A ☐ 1 lbs/gal ☐ 2 sg

E. Limitation on maximum operational capacity
Page 43.

1. 0 9 2. 1 3. 1

F. Commercial capacity availability code
Page 43.

1

G. Percent capacity commercially available
Page 43.

0 %

Comments:

After treatment, all wastes were shipped off-site as
"non-hazardous".

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Ashland Chemical Company
Neal Plant

EPA ID NO: W V D 0 8 0 6 4 5 8 3 1 1



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1995 Hazardous Waste Report

FORM
01

OFF-SITE
IDENTIFICATION

INSTRUCTIONS: Read the detailed instructions on the reverse side before completing this form.

| | | |
|--|--|--|
| Site 1 | A. EPA ID No. of off-site installation or transporter <u>0 H D 0 7 4 7 0 0 3 1 1</u> | B. Name of off-site installation or transporter <u>Ashland Chemical Company</u> |
| C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input checked="" type="checkbox"/> Transporter <input checked="" type="checkbox"/> TSDR | D. Address of off-site installation Street <u>2854 Springboro Pike W.</u> City <u>Dayton</u> State <u>0 H</u> Zip <u>4 5 4 3 9</u> | |
| Site 2 | A. EPA ID No. of off-site installation or transporter <u>M A D 0 3 9 3 2 2 2 5 0</u> | B. Name of off-site installation or transporter <u>Clean Harbors Environmental Services, Inc.</u> |
| C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input checked="" type="checkbox"/> Transporter <input type="checkbox"/> TSDR | D. Address of off-site installation Street _____ City _____ State _____ Zip _____ | |
| Site 3 | A. EPA ID No. of off-site installation or transporter <u>C T D 0 0 0 6 0 4 4 8 8</u> | B. Name of off-site installation or transporter <u>Clean Harbors of Connecticut, Inc.</u> |
| C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input checked="" type="checkbox"/> TSDR | D. Address of off-site installation Street <u>51 Broderick Road</u> City <u>Bristol</u> State <u>C T</u> Zip <u>0 6 0 1 0</u> | |
| Site 4 | A. EPA ID No. of off-site installation or transporter <u>A I R I D 9 8 1 1 0 5 7 1 8 7 1 0</u> | B. Name of off-site installation or transporter <u>Rineco Chemical</u> |
| C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input checked="" type="checkbox"/> TSDR | D. Address of off-site installation Street <u>1007 Vulcan Road - Haskell</u> City <u>Benton</u> State <u>A R</u> Zip <u>7 2 0 1 5</u> | |
| Site 5 | A. EPA ID No. of off-site installation or transporter <u>0 H D 0 0 0 8 1 6 6 2 9</u> | B. Name of off-site installation or transporter <u>Spring Grove Resource Recovery</u> |
| C. Handler type (CHECK ALL THAT APPLY) <input type="checkbox"/> Generator <input type="checkbox"/> Transporter <input checked="" type="checkbox"/> TSDR | D. Address of off-site installation Street <u>4879 Spring Grove Avenue</u> City <u>Cincinnati</u> State <u>0 H</u> Zip <u>4 5 2 3 2</u> | |

Comments:

DOCUMENT REQUEST FORM
ASHLAND CHEMICAL MALEIC ANHYDRIDE PLANT
NEAL WEST VIRGINIA
(For use with any agency inspection)

1. ~~Inspector:~~ ED GRAVES
2. ~~Agency:~~ ASHLAND CHEMICAL
3. Document ^{Provided} ~~Requested:~~ Waste Determination for process wastewater
4. Date Requested: 9-18-97
5. Document Delivered By: Ed Graves
6. Date and Time Received: 9-18-97 2:45 p.m.
7. Document Received By: _____
8. Document Returned To: _____
9. Date and Time Returned: _____
10. Notes: COPY TO: BETTY BARNES, USEPA
JIM BAILEY, USEPA
PENNY BROWN, WV DEP

Fax this to Betty
Barnes.

This is the company's
position on the
material in question.

September 18, 1997

Betty Barnes
U.S. Environmental Protection Agency
Region III
841 Chestnut Street
Philadelphia, PA 19107

Subject: **Waste determination for Neal, WV process wastewater
Ashland Chemical multi-media inspection**

This provides the rationale for the waste determination and references to the applicable hazardous waste regulations as they apply to two waste streams generated at Ashland Chemical Company's Neal, WV maleic anhydride manufacturing facility. The two waste streams are: 1) the batch refiner wash water, and 2) the process waste water which is piped across the Big Sandy River to Ashland Petroleum Company's Catlettsburg refinery for waste water treatment.

- 1) Batch refiner wash water is generated from water washing of the batch refining column (D-410), still pot (D-411), and associated process piping. The wash water is discharged to the tanks in M-1410 pit, where it is neutralized to raise the pH above the level which would make it a characteristically hazardous waste. The waste water is either shipped off-site as non-regulated waste to a commercial waste water treatment facility or discharged to the process sewer system and treated in the Catlettsburg refinery waste water treatment plant. With regard to whether this waste should be identified as a listed RCRA hazardous waste, specifically U147 (Commercial chemical product maleic anhydride), the relevant regulatory citation is found in 40 CFR §261.33(d). The comment at the end of this paragraph states in essence that the U-listing applies to the commercially pure grade of the chemical, technical grades produced or marketed, and formulations in which the listed chemical is the sole active ingredient. The comment specifically states that the U-listing does not refer to a manufacturing process waste that contains any U-listed substance. Therefore, the batch refiner waste water is not a U147 listed hazardous waste.
- 2) With regard to whether the process waste water which is piped to the Catlettsburg refinery is considered a RCRA listed hazardous waste due to the discharge of the sample purging buckets into this stream, the relevant regulatory citation is 40 CFR §261.3(a)(2)(iv)(D). This states, in essence, that mixtures of wastewater subject to regulation under the Clean Water Act and a discarded commercial chemical product arising from *de minimus* losses of these materials from manufacturing process operations are not hazardous wastes. This paragraph goes on to list examples of losses which are considered *de minimus*. Sample purgings are included in this list. Therefore, the process wastewater is not a U147 listed hazardous waste due to the discharge of the sample purging buckets into the wastewater stream.

Attachments

§ 261.33 Discarded commercial chemical products, off-specification species, container residues, and spill residues thereof.

◆ RCRA—29, 122, 211

The following materials or items are hazardous wastes if and when they are discarded or intended to be discarded as described in § 261.2(a)(2)(i), when they are mixed with waste oil or used oil or other material and applied to the land for dust suppression or road treatment, when they are otherwise applied to the land in lieu of their original intended use or when they are contained in products that are applied to the land in lieu of their original intended use, or when, in lieu of their original intended use, they are produced for use as (or as a component of) a fuel, distributed for use as a fuel, or burned as a fuel.

(a) Any commercial chemical product, or manufacturing chemical intermediate having the generic name listed in paragraph (e) or (f) of this section.

(b) Any off-specification commercial chemical product or manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in paragraph (e) or (f) of this section.

◆ RCRA—311

(c) Any residue remaining in a container or in an inner liner removed from a container that has held any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraphs (e) or (f) of this section, unless the container is empty as defined in § 261.7(b) of this chapter.

◆ RCRA—334

[Comment: Unless the residue is being beneficially used or reused, or legitimately recycled or reclaimed; or being accumulated, stored, transported or treated prior to such use, re-use, recycling or reclamation, EPA considers the residue to be intended for discard, and thus, a hazardous waste. An example of a legitimate re-use of the residue would be where the residue remains in the container and the container is used to hold the same commercial chemical product or manufacturing chemical intermediate it previously held. An example of the discard of the residue would be where the drum is sent to a drum reconditioner who reconditions the drum but discards the residue.]

(d) Any residue or contaminated soil, water or other debris resulting from the cleanup of a spill into or on any land or water of any commercial chemical product or manufacturing chemical intermediate having the generic name listed in paragraph (e) or (f) of this section, or any residue or contaminated soil, water or other debris resulting from the cleanup of a spill, into or on any land or water, of any off-specification chemical product and manufacturing chemical intermediate which, if it met specifications, would have the generic name listed in paragraph (e) or (f) of this section.

◆ RCRA—19, 226, 235, 290, 349

[Comment: The phrase "commercial chemical product or manufacturing chemical intermediate having the generic name listed in . . ." refers to a chemical substance which is manufactured or formulated for commercial or manufacturing use which consists of the commercially pure grade of the chemical, any technical grades of the chemical that are produced or marketed, and all formulations in which the chemical is the sole active ingredient. It does not refer to a material, such as a manufacturing process waste, that contains any of the substances listed in paragraph (e) or (f). Where a manufacturing process waste is deemed to be a hazardous waste because it contains a substance listed in paragraph (e) or (f), such waste will be listed in either § 261.31 or § 261.32 or will be identified as a hazardous waste by the characteristics set forth in Subpart C of this part.]

◆ RCRA—211, 273, 306, 390

(e) The commercial chemical products, manufacturing chemical intermediates or off-specification commercial chemical products or manufacturing chemical intermediates referred to in paragraphs (a) through (d) of this section, are identified as acute hazardous wastes (H) and are subject to be the small quantity exclusion defined in § 261.5(e).

◆ RCRA—358

[Comment: For the convenience of the regulated community the primary hazardous properties of these materials have been indicated by the letters T (Toxicity), and R (Reactivity). Absence of a letter indicates that the compound only is listed for acute toxicity.]

These wastes and their corresponding EPA Hazardous Waste Numbers are:

BATCH REFINER WASH WATER

(e) *Materials that are not solid waste when recycled.*

(1) Materials are not solid wastes when they can be shown to be recycled by being:

(i) Used or reused as ingredients in an industrial process to make a product, provided the materials are not being reclaimed; or

◆ RCRA—38

(ii) Used or reused as effective substitutes for commercial products; or

◆ RCRA—49, 81, 276

(iii) Returned to the original process from which they are generated, without first being reclaimed or land disposed. The material must be returned as a substitute for feedstock materials. In cases where the original process to which the material is returned is a secondary process, the materials must be managed such that there is no placement on the land.

(2) The following materials are solid wastes, even if the recycling involves use, reuse, or return to the original process (described in paragraphs (e)(1)(i) through (iii) of this section):

(i) Materials used in a manner² constituting disposal, or used to produce products that are applied to the land; or

(ii) Materials burned for energy recovery, used to produce a fuel, or contained in fuels; or

(iii) Materials accumulated speculatively; or

(iv) Materials listed in paragraphs (d)(1) and (d)(2) of this section.

(f) *Documentation of claims that materials are not solid wastes or are conditionally exempt from regulation.* Respondents in actions to enforce regulations implementing Subtitle C of RCRA who raise a claim that a certain material is not a solid waste, or is conditionally exempt from regulation, must demonstrate that there is a known market or disposition for the material, and that they meet the terms of the exclusion or exemption. In doing so, they must provide appropriate documentation (such as contracts showing that a second person uses the material as an ingredient in a production process) to demonstrate that the material is not a waste, or is exempt from regulation. In addition, owners or operators of facilities claiming that they actually are recycling materials must show that they have the necessary equipment to do so.

◆ RCRA—64, 262

[50 FR 664, Jan. 4, 1985, as amended at 50 FR 33542, Aug. 20, 1985; 56 FR 7206, Feb. 21, 1991; 56 FR 42512, Aug. 27, 1991; 57 FR 38564, Aug. 25, 1992; 59 FR 48041, Sept. 19, 1994]

§ 261.3 Definition of hazardous waste.

◆ RCRA—126

(a) A solid waste, as defined in § 261.2, is a hazardous waste if:

(1) It is not excluded from regulation as a hazardous waste under § 261.4(b); and

(2) It meets any of the following criteria:

(i) It exhibits any of the characteristics of hazardous waste identified in Subpart C except that any mixture of a waste from the extraction, beneficiation, and processing of ores and minerals excluded under § 261.4(b)(7) and any other solid waste exhibiting a characteristic of hazardous waste under Subpart C of this part only if it exhibits a characteristic that would not have been exhibited by the excluded waste alone if such mixture had not occurred or if it continues to exhibit any of the characteristics exhibited by the non-excluded wastes prior to mixture. Further, for the purposes of applying the Toxicity Characteristic to such mixtures, the mixture is also a hazardous waste if it exceeds the maximum concentration for any contaminant listed in Table I to § 261.24 that would not have been exceeded by the excluded waste alone if the mixture had not occurred or if it continues to exceed the maximum concentration for any contaminant exceeded by the nonexempt waste prior to mixture.

(ii) It is listed in Subpart D of this part and has not been excluded from the lists in Subpart D of this part under §§ 260.20 and 260.22 of this chapter.

(iii) It is a mixture of a solid waste and a hazardous waste that is listed in Subpart D of this part solely because it exhibits one or more of the characteristics of hazardous waste identified in Subpart C of this part, unless the resultant mixture no longer exhibits any characteristic of hazardous waste identified in Subpart C of this part, or unless the solid waste is excluded from regulation under § 261.4(b)(7) and the resultant mixture no longer exhibits any characteristic of hazardous waste identified in Subpart C of this part for which the hazardous waste listed in Subpart D of this part was listed. (However, nonwastewater mixtures are still subject to the requirements of part 268 of this chapter, even if they no longer exhibit a characteristic at the point of land disposal).

◆ RCRA—46, 63, 100, 159

(iv) It is a mixture of solid waste and one or more hazardous wastes listed in Subpart D of this part and has not been excluded from paragraph (a)(2) of this section under §§ 260.20 and 260.22 of this chapter; however, the following mixtures of solid wastes and hazardous wastes listed in Subpart D of this part are not hazardous wastes (except by application

of paragraph (a)(2) (i) or (ii) of this section) if the generator can demonstrate that the mixture consists of wastewater discharge of which is subject to regulation under either Section 402 or Section 307(b) of the Clean Water Act (including wastewater at facilities which have eliminated the discharge of wastewater) and:

◆ RCRA—234, 249, 260

(A) One or more of the following solvents listed in § 261.31—carbon tetrachloride, tetrachloroethylene, trichloroethylene—*Provided*, That the maximum total weekly usage of these solvents (other than the amounts that can be demonstrated not to be discharged to wastewater) divided by the average weekly flow of wastewater into the headworks of the facility's wastewater treatment or pretreatment system does not exceed 1 part per million; or

(B) One or more of the following spent solvents listed in § 261.31—methylene chloride, 1,1,1-trichloroethane, chlorobenzene, o-dichlorobenzene, cresols, cresylic acid, nitrobenzene, toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, spent chlorofluorocarbon solvents—provided that the maximum total weekly usage of the solvents (other than the amounts that can be demonstrated not to be discharged to wastewater) divided by the average weekly flow of wastewater into the headworks of the facility's wastewater treatment or pretreatment system does not exceed 25 parts per million; or

(C) One of the following wastes listed in § 261.32—heat exchanger bundle cleaning sludge from the petroleum refining industry (EPA Hazardous Waste No. K050); or

→ (D) A discarded commercial chemical product, or chemical intermediate listed in § 261.33, arising from *de minimis* losses of these materials from manufacturing operations in which these materials are used as raw materials or are produced in the manufacturing process. For purposes of this paragraph (a)(2)(iv)(D), "*de minimis*" losses include those from normal material handling operations (e.g., spills from the unloading or transfer of materials from bins or other containers, leaks from pipes, valves or other devices used to transfer materials); minor leaks of process equipment, storage tanks or containers; leaks from well maintained pump packings and seals; sample purgings; relief device discharges; discharges from safety showers and rinsing and cleaning of personal safety equipment; and rinsate from empty containers or from containers that are rendered empty by that rinsing; or

◆ RCRA—139

(E) Wastewater resulting from laboratory operations containing toxic (T) wastes listed in Subpart D of this part. *Provided*, That the annualized average flow of laboratory wastewater does not exceed one percent of total wastewater flow into the headworks of the facility's wastewater treatment or pre-treatment system, or provided the wastes, combined annualized average concentration does not exceed one part per million in the headworks of the facility's wastewater treatment or pre-treatment facility. Toxic (T) wastes used in laboratories that are demonstrated not to be discharged to wastewater are not to be included in this calculation; or

◆ RCRA—379

(F) One or more of the following wastes listed in § 261.32—wastewaters from the production of carbamates and carbamoyl oximes (EPA Hazardous Waste No. K157)—*Provided* that the maximum weekly usage of formaldehyde, methyl chloride, methylene chloride, and triethylamine (including all amounts that can not be demonstrated to be reacted in the process, destroyed through treatment, or is recovered, i.e., what is discharged or volatilized) divided by the average weekly flow of process wastewater prior to any dilutions into the headworks of the facility's wastewater treatment system does not exceed a total of 5 parts per million by weight; or

(G) Wastewaters derived from the treatment of one or more of the following wastes listed in § 261.32—organic waste (including heavy ends, still bottoms, light ends, spent solvents, filtrates, and decantates) from the production of carbamates and carbamoyl oximes (EPA Hazardous Waste No. K156).—*Provided*, that the maximum concentration of formaldehyde, methyl chloride, methylene chloride, and triethylamine prior to any dilutions into the headworks of the facility's wastewater treatment system does not exceed a total of 5 milligrams per liter.

(v) *Rebuttable presumption for used oil*. Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste because it has been mixed with halogenated hazardous waste listed in Subpart D of Part 261 of this chapter. Persons may rebut this presumption by demonstrating that the used oil does not contain hazardous waste (for example, by using an analytical method from SW-846, Third Edition, to show that the used oil does not contain significant concentrations of halogenated hazardous constituents listed in appendix VIII of Part 261 of this chapter). EPA Publication SW-846, Third Edition, is available for the cost of \$110.00 from the Government Printing Office, Superintendent of Documents, PO Box 371954, Pittsburgh, PA 15250-7954. 202-783-3238 (document number 955-001-00000-1).

(A) The rebuttable presumption does not apply to metalworking oils/fluids containing chlorinated paraffins, if they are processed, through a tolling agreement, to reclaim metalworking oils/fluids. The presumption does apply to metalworking oils/fluids if such oils/fluids are recycled in any other manner, or disposed.

THE FOLLOWING FILE(S) ERASED

FILE FILE TYPE
072 MEMORY TX

OPTION

TEL NO.

8-2155662905

PAGE RESULT
06/06 OK.....
ERRORS

1) HANG UP OR LINE FAIL

2) BUSY

3) NO ANSWER

4) NO FACSIMILE CONNECTION
.....**EPA**
Region III**E FAX**

FROM: name

James L. Bailey
of USEPA Wheeling Office

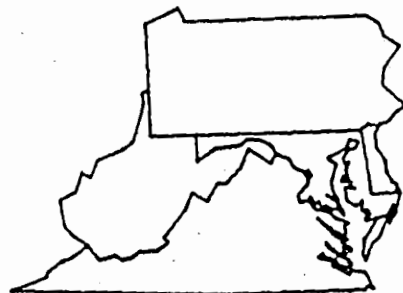
303 Methodist Bldg.

Wheeling, WV 26003

FAX NO. COM: (304)234-0257

OFFICE PHONE: COM: (304)234-0267

5



JUST THE FAX

TO: name Betty Bernes
of (agency) USEPA
location Philadelphia
office phone 215-566-3447

DATE: 9-17-87

FROM: name James L. Bailey
of USEPA Wheeling Office
303 Methodist Bldg.
Wheeling, WV 26003
FAX NO. COM: (304)234-0257

OFFICE PHONE: COM: (304)234-0267

Number of pages not including cover page 5.

NOTE:

EPA GENERATOR CHECKLIST

Name of Facility: Ashland Chemical Maleic Anhydride Plant

Address of Facility: Big Sandy River Road

Neal W.V. 25530

OR P.O. Box 391, Ashland, Ky 41101

EPA I.D. Number: WV080645 831

Name/Title of Facility

Representative: Steve Lockow - RCRA/NDE's Staff Neal Plant

Perry Foxwell - Office Manager Neal Plant

Edward C. Graves - Staff Engineer, Columbus, Ohio

I. General

1. Provide a brief description of the type of operation(s) that produces hazardous waste at this facility:

The facility manufactures Maleic Anhydride by oxidizing butene in the presence of a catalyst. Waste (Hazardous) generated in the largest quantity is Maleic Anhydride waste water, pH 2.0 SU. This wastewater is pH adjusted (>2.0) on site either pumped to Ashland Ky Plant or transported off site by truck.

2. Does the facility perform the following on-site:

a. storage (>90 day) of hazardous waste? yes ☒ no

b. treatment of hazardous waste? yes ☒ However t.

do pH adjustment in tanks.

c. disposal of hazardous waste? yes ☒ no

(if yes, complete appropriate TSD checklists)

List the maximum amount of each type of hazardous waste generated on a monthly basis and the amount accumulated on-site at the time of the inspection.

Activated Spent Carbon and Tri Methyl phosphite

Waste heat Transfer Salt and insulation

Waste heat Transfer Salt

Maleic Anhydride (Lab product tetraols)

Fluorescent Light Bulbs

Paint with lead

Parts Cleaner - Waste 140 Solvent

Waste Xylene (Seal from F-414 Flozting Root)

Maleic Anhydride & Insulation

PCB Bollet

Triethyl phosphite (unused Product)

261.4

3. Is the facility subject to any exclusions for it's hazardous waste? yes ☒ no

If yes, list the waste and basis for exclusion:

WASTE MINIMIZATION:

WHAT HAS BEEN DONE FACILITY WIDE TO REDUCE THE VOLUME AND OR TOXICITY OF THE WASTES GENERATED?

Pollution Prevention plan
3350 program for xylene

Reduce quantity of material requiring Neutralizer.
Overall reduction in waste material generated.

262.11(c)

4. Does the facility generate any characteristic hazardous waste? ☒ yes ☐ no

If yes, describe how these characteristics were determined (i.e., testing or knowledge of process/materials used).

Through knowledge of waste and testing.

5. Does the facility contemplate any changes in its operation from a hazardous waste generation or management perspective? ☒ no ☐ yes No hard plans ready to implement.

If yes, describe: _____

II. Manifest

Complete this section only if facility ships hazardous waste off-site.

262.20(a)

1. Does the facility use the Uniform Hazardous Waste Manifest? ☒ yes ☐ no

If no, explain manifest system used: _____

If yes, review a representative number of manifests and indicate whether they contain:

a. Generator's name, mailing address, telephone number and EPA ID number? ☒ yes ☐ no

Manifest System

*Two Manifest Copies Attached
RCRA Attachment No. 1*

Complete this section only if facility ships hazardous waste off-site.

1. Identify the name and address of off-site facilities which have received waste from this generator.

Name: _____

Address: _____

I.D. No. _____

Name: _____

Address: _____

I.D. No. _____

Name: _____

Address: _____

I.D. No. _____

b. Transporter's name and EPA ID number? ☒ yes ☐ no

c. DOT waste description, including proper shipping name, hazardous waste class and DOT identification number?
☒ yes ☐ no

d. Number and type of containers (if applicable)?
☒ yes ☐ no

e. Quantity of each waste transported? ☒ yes ☐ no

f. Name, EPA ID number and site address of facility designated to receive the waste? ☒ yes ☐ no

g. The following certification? ☒ yes ☐ no

"I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and environment."

262.23(a)

2. Did the generator:-

a. Sign and date the manifest? ☒ yes ☐ no

b. Obtain the handwritten signature and date of acceptance from the initial transporter? ☒ yes ☐ no

c. Ensure that return copies of the manifest from the designated TSD facility were properly signed and dated?
☒ yes ☐ no

d. Retain a copy of the signed manifest for at least three years? ☒ yes ☐ no

The inspector should obtain copies of any manifests that are found to have problems.

III. Pre-Transport Requirements

Complete this section only if the facility ships hazardous waste off site.

1. Is there any indication that the facility is:

262.30

a. Not packaging its waste in accordance with DOT regulations (49 CFR Parts 173, 178 and 179)?
yes ☒ no

262.31

b. Not labelling each package in accordance with DOT regulations (49 CFR Part 172)? yes ☒ no

262.32(a) & (b)

c. Not marking each container of 110 gallons or less with the words "hazardous waste -----" or each package of hazardous waste in accordance with DOT regulations (49 CFR Part 172)? yes ☒ no

If yes, explain: _____

262.33

2. Does the facility placard or offer the transporter placards for its hazardous waste shipments? ☒ yes ☐ no

IV. Waste Accumulation

1. Does the facility utilize the following types of hazardous waste accumulation:

a. Satellite accumulation? ☒ yes ☐ no Lab wastes

b. Less than 90 day storage? ☒ yes ☐ no

Answer the following questions if the generator has satellite accumulation area(s).

262.34(c) (1)

2. Is satellite accumulation area(s) near the point of waste generation and under the control of the operator of the process actually generating the waste? ☒ yes ☐ no
outside the laboratory. - PHOTO TAKEN.

If no, describe: _____

262.34(c)(1)

3. Are there multiple satellite accumulation areas for any one process that generates hazardous waste? yes ☒ no ☒
only one satellite accumulation area which is near the laboratory
If yes, describe: _____

262.34(c)(1)

4. Is the waste stored in container(s)? ☒ yes ☐ no
Photo taken. The drummed waste

265.171

5. Are container(s) in good condition? ☒ yes ☐ no

If no, explain: _____

262.34(c)(1)(ii) satellite accumulation)

6. Are container(s) marked with the words "hazardous waste" or with other words that identify the contents? ☒ yes ☐ no

265.173(a)

7. Are container(s) kept closed? ☒ yes ☐ no

265.171

8. Are any container(s) leaking? yes ☐ no ☒

If yes, describe: _____

262.34(c)(1)

9. Has the facility accumulated more than 55 gallons of hazardous waste or more than 1 quart of acutely hazardous waste in a satellite accumulation area? yes ☐ no ☒

If yes:

262.34(c) (2)

a. Are the container(s) holding excess waste dated as to when accumulation began? yes no

b. Does the excess waste comply with the less than 90 day storage requirements (40 CFR Part 262.34(a)) within three days of the time when accumulation of such excess waste began? yes no

Answer the following questions if the facility has less than 90 day storage.

262.34(a) (4)

10. Does the facility maintain personnel training and other records required in 40 CFR Part 265.16? yes no

If yes, do these records include:

265.16(d) (1)

a. Job title for each position related to hazardous waste management and the employee filling each job?

yes no *The Job titles are production orientated & occurs at most mid to smaller facilities.*

265.16(d) (2)

b. A written job description for each position? *Written*
yes no *DESCRIPTION do exist but they do NOT include the Hazardous Waste Related Activities.*

265.16(d) (3)

c. A written description of the type and amount of training that will be given to each person?

yes no

265.16(d) (4)

d. Records that document that the training or job experience required by facility personnel to effectively respond to emergencies and otherwise manage hazardous waste in a proper manner has been successfully completed?

yes no

265.16(b)

11. Have facility personnel successfully completed the required training or job experience within six months after occupying the position? yes no

265.16(c)

12. Do facility personnel take part in an annual review of the initial training requirements and update them as necessary?

yes no

262.34(a) (4)

13. Does the facility maintain an adequate preparedness and

prevention program as required in 40 CFR Part 265 Subpart C?
yes no

Is the facility equipped with:

265.32 (a)

a. Internal communications or alarm system? yes no

265.32 (b)

b. Telephone or hand-held two-way radio? yes no

265.32 (c)

c. Portable fire extinguishers or other fire control equipment, spill control equipment and decontamination equipment? yes no Both portable and built in system.

265.32 (d)

d. Adequate volume of water? yes no

265.33

14. Does the facility test and maintain the above equipment to assure its proper operation? yes no

265.35

15. Is there sufficient aisle space to allow the unobstructed movement of personnel and equipment to areas where hazardous waste are located in the event of an emergency? yes no
only one drum in the so dry area and one drum in the Satellite Accumulation 2

265.37 (a) (1)

16. Has the facility made arrangements with local authorities to familiarize them with the layout of the facility and the nature/hazards of the hazardous waste handled at the facility?

yes no Kenosha Fire Dept plus those of Ceredo, Prichard, and the refinery fire dept.

262.34 (a) (4)

17. Has the facility prepared a contingency plan and is it maintained at the facility? yes no

If yes, does it contain the following:

265.52 (a)

a. Description of the actions that are to be taken in case of an emergency (all potential types of emergencies should be identified)? yes no

265.52 (c)

b. Description of arrangements made with local authorities? yes no

265.52 (d)

c. Current list of emergency coordinators' names, addresses and phone numbers (office and home)?

yes no

265.52(e)

d. List of all emergency equipment at the facility, including locations, descriptions and relevant capabilities? ☒ yes no

265.52(f)

e. evacuation plan for facility personnel? ☒ yes no

The inspector should obtain a copy of the facility's contingency plan if any problems are found.

265.53(b)

18. Were copies of the contingency plan submitted to local authorities that may provide emergency services? yes no

19. Has the facility's contingency plan ever failed in an emergency? yes ☒ no N/A Implemented in 1990,

If yes:

265.54(b)

a. Was the contingency plan immediately amended? yes no N/A at that time.

265.56(j)

20. If the contingency plan is implemented, does the facility record the incident in its operating log and submit a written report of the incident to the appropriate state agency? ☒ yes no N/A

262.34(a)(1)

21. What is the method of waste storage:

Containers? ☒ yes no 55 Gallon drums

Tanks? yes no

Other? yes no

If other, describe: _____

Answer the following questions if the facility uses container storage.

262.34(a)(2)&(3)

22. Are the container(s) marked with the words "Hazardous Waste" and the date that waste accumulation in that container begins? ☒ yes no Only one drum in the designated

90 day accumulation area.

262.34(a)

23. Based upon accumulation dates, have any container(s) been in storage for more than 90 days? yes no

If yes, the inspector should complete the appropriate TSD checklists.

265.171

24. Are container(s) in good condition? yes no *Photo Taken*

If no, explain: _____

265.172

25. Are container(s) made of or lined with materials which will not react with or be incompatible with the waste they are storing? yes no

265.173(a)

26. Are container(s) kept closed? yes no

265.171

27. Are any container(s) leaking? yes no

If yes, describe: _____

265.174

28. Are container storage area(s) inspected at least weekly and is an adequate inspection record/log maintained? yes no *A Copy of the weekly inspection form obtained*

If no, explain: _____

265.176

29. Are container(s) holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? yes no N/A

30. Are incompatible wastes placed in the same container(s)?
yes no *no documentation existed week of Sep 15, 1997.*

If yes:

265.177(a)

a. Is there any evidence that conditions of extreme heat or pressure, fire or explosion, violent reactions or toxic emissions occurred? yes no

If yes, describe: _____

265.177(c)

31. Are container(s) holding incompatible hazardous waste properly separated or protected from one another while in storage? yes no N/A *no known incompatible waste gen at this facility*

If no, explain: _____

Answer the following questions if the facility uses tank storage. *No documented storage of hazardous waste in TAN*

262.34(a)(3)

32. Is the tank(s) labelled or clearly marked with the words "Hazardous Waste"? yes no

262.34(a)

33. Is the tank marked with the date that waste accumulation begins in that tank(s) or does the facility have in its records when waste accumulation started in that tank(s)?
yes no

262.34(a)

34. Based upon accumulation dates, has the facility stored hazardous waste in its tank(s) for longer than 90 days?
yes no

If yes, the inspector should complete the appropriate TSD checklists.

35. Which of the following describes the type of tank(s) employed at this facility (circle the appropriate one)?

- a. Indoor - not on impermeable floor
- b. Indoor - on impermeable floor
- c. Outdoor - above ground
- d. Outdoor - in ground

e. Outdoor - underground

36. What is the approximate age of the tank(s)?

265.191

37. Does the tank(s) appear to be in good condition?
yes no can't tell

If no, describe: _____

265.191

38. Is the tank(s) leaking? yes no can't tell

If yes, describe: _____

265.193

39. Is the tank(s) provided with an effective secondary
containment system? yes no

If yes, describe: _____

If no:

265.191(a)

a. Does the facility have a written assessment reviewed
and certified by an independent, qualified, registered
professional engineer that attests to the tank(s)'s
structural integrity? yes no

265.191(b)

40. Was a leak test performed on the tank(s)? yes no

If yes, provide date of most recent test: _____

265.194(b)

41. Is the tank(s) provided with adequate controls to prevent
spills and overflows (i.e., automatic feed cutoff, bypass to
another unit, high level alarms, etc.)? yes no

265.194(b)

42. Is there sufficient freeboard (2 feet) in uncovered tanks to prevent overtopping by wave or wind action or precipitation? yes no N/A

265.195(a)

43. Is the tank(s) inspected each operating day? yes no

If yes, do inspections include:

265.195(a)(1)

a. Overfill/spill control equipment? yes no

265.195(a)(2)

b. Aboveground portions of the tank(s) for corrosion or releases? yes no N/A

265.195(a)(3)

c. Data gathered from monitoring equipment and leak detection equipment? yes no

265.195(a)(4)

d. Area immediately surrounding the externally accessible portion of the tank(s) and secondary containment system for signs of erosion or releases? yes no N/A

265.195(b)(1)

44. Does the facility perform annual inspections of the cathodic protection systems, if present?
yes no N/A

265.195(c)

45. Does the facility properly document all of the results of its tank system inspections? yes no

265.196

46. Is there any indication that the facility did not properly respond to spills or leaks from a tank(s) (this would include failure to stop the spill/leak, failure to clean up spilled/leaked material, failure to minimize migration, failure to remove tank from service immediately, failure to provide notification, etc.)? yes no

If yes, describe: _____

47. Does the facility store any ignitable or reactive waste in its tank(s)? yes no

If yes:

265.198(a)(1)

a. Is the waste treated, rendered or mixed before or immediately after placement in the tank(s) so that it no longer meets the definition of ignitable or reactive waste? yes no

265.198(a)(2)

b. Is the waste stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react? yes no

265.198(a)(3)

c. Is the tank(s) used solely for emergencies?
yes no

265.198(b)

d. Does the tank(s) appear to be a safe distance from the facility's property line and public thoroughfares?
yes no

If no, describe: _____

48. Is there any indication that incompatible wastes are being stored in a tank(s)? yes no

If yes:

265.199(a)

a. Is there any evidence that conditions of extreme heat or pressure, fire or explosion, violent reactions or toxics emissions occurred? yes no

If yes, describe: _____

V. Recordkeeping and Reports

262.42((a)(2)

1. Does the facility prepare an Exception Report and submit it to the Regional Administrator if a signed copy of the manifest is not received within 45 days of the date the waste was

accepted by the initial transporter?

yes

no

*Must be required to date but
do so if required*

If yes, does the Exception Report include:

a. Legible copy of the manifest?

yes

no

b. Cover letter explaining generator's efforts to locate waste and the results of those efforts?

yes

no

262.41(a)

2. If the facility ships any hazardous waste off-site, does it prepare a Biennial Report and submit it to the Regional Administrator by March 1 of each even numbered year?

yes

no

N/A

Copy obtained

If yes, does the Biennial Report include:

262.41(a)(3)

a. Name, address and EPA ID number for each off-site TSD facility to which waste was shipped during the year?

yes

no

262.41(a)(4)

b. Name and EPA ID number of each transporter used during the year?

yes

no

262.41(a)(5)

c. Description and quantity of each hazardous waste shipped off-site (listed by EPA ID number of each TSD facility to which was shipped)?

yes

no

262.41(a)(6)

d. Efforts undertaken during the year to reduce the volume and toxicity of the waste generated?

yes

no

262.41(a)(7)

e. Description of the changes in volume and toxicity of the waste actually achieved during the year?

yes

no

262.40(a)(b)(c)

3. Does the facility retain copies of Biennial Reports, Exception Reports and test results/waste analyses for a minimum of 3 years from the date that the waste was last sent to on-site or off-site treatment, storage or disposal?

yes

no

A d d i t i o n a l C o m m e n t s :

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are approximately 20 lines visible. The paper appears slightly aged or off-white. There is no handwriting or other markings on the page.

Inspector's Name: James L. Bailey
Title: Environmental Scientist
Agency: USFPA
Office location: Wheeling, WV 26003
Date of inspection: September 15-18, 1997

Inspector's name: _____
Title: _____
Agency: _____
Date of inspection: _____

LDR CHECKLIST FOR GENERATORS

NAME OF FACILITY: Ashland Chemical Moleic Anhydride Plant

ADDRESS OF FACILITY: Big Sandy River Road
Neal, WV 25530

OR P.O. Box 391 Ashland, Ky 41101

EPA I.D. NUMBER WV080645831

NAME AND TITLE OF FACILITY

REPRESENTATIVE: Steve Lochow - RCRA/NPDES Staff, Neal Plant
Perry Foxwell - Office Mgr. Neal Plant
Edward C. Groves - Staff Engineer, Columbus, Ohio

INSPECTORS NAME: James L. Bailey

TITLE: Environmental Scientist

AGENCY: USEPA

OFFICE LOCATION: Wheeling, WV

DATE OF INSPECTION: Sept 15-18, 1997

List the maximum amount of each type of hazardous waste generated on a monthly basis and the amount accumulated on-site at the time of the inspection.

| <u>Waste Code</u> | <u>Amount Generated</u> | <u>Amount Accumulated</u> |
|-------------------|--|---------------------------|
| <u>D001/D007</u> | <u>Hazardous Waste Report Attached</u> | <u></u> |
| <u>D008</u> | <u></u> | <u></u> |
| <u>D009</u> | <u></u> | <u></u> |
| <u>D001, D007</u> | <u></u> | <u></u> |
| <u>D001</u> | <u></u> | <u></u> |
| <u>D002/U147</u> | | |
| <u>D007</u> | | |
| <u>D002</u> | | |

LDR CHECKLIST FOR GENERATORS

261.20 - 261.24

1. Does the facility generate any "characteristic" hazardous waste?
☒ Yes No

If yes, circle the appropriate one(s)

☒ D001

☒ D002

D003

☒ D004-D017

D018-D043*

* Newly listed - not yet subject to LDR regs

55 FR 22534(O) (6/1/90)

2. Does the facility generate any hazardous waste that is a liquid and either contains over 50 ppm of PCB, over 1000 ppm of HOCs and has an unrelated characteristic property, or is a characteristic waste containing over 134 ppm of nickel and/or 130 ppm of thallium (i.e., relevant descriptors of old California List wastes)?

☒ Yes

☒ No

261.30 - 261.33

3. Does the facility generate any "listed" hazardous waste?
☒ Yes No

Circle the appropriate code(s)

F

K

P

☒ U/47

268.5 & 268.6

4. Is any of the facility's waste subject to an LDR exemption, waiver, delisting or national capacity variance? Yes ☒ No

If yes, describe which and obtain documentation:

262.11(c) 55 FR 22530(B.2) (6/1/90) 268.9(a)

5. Does the facility (a) test its waste or (b) apply knowledge of its waste to determine whether its listed waste exhibits a characteristic of hazardous waste?

☒ Yes

No

N/A ☒

If yes, circle (a) or (b) *Both methods are used,*

268.7(a)

6. Does the generator (a) test its waste(s) or (b) use knowledge of the waste(s) to determine if it is prohibited from land disposal, (i.e., does not meet applicable treatment standards)?
Yes No All assumed to be prohibited from Land Disf

If yes, circle (a) or (b)

268.7(a) 55 FR 22535(P) (06/01/90)

7. If testing of waste is performed, does the facility do a total waste analysis where required and/or a TCLP waste extract analysis where it is required? Yes No N/A

268.7(a)(1) 268.32 268.40 - 268.43

8. Does the facility's hazardous waste(s) exceed the applicable treatment standards upon generation? Yes No N/A
OR is assumed to exceed the treatment standards.

51 FR 40606(V) (11/7/86)

9. If the facility generates waste containing any of the organic solvents listed in the F001 - F005 waste codes, were those chemicals used for or did the waste result from their solvent properties (i.e., degreasing, dissolving, cleaning, solubilizing, etc.)? Yes No N/A

If N/A, skip to question 12

If no, what were these chemicals used for? Describe below:

10. How did the facility classify the waste containing the organic solvents listed in the F001 - F005 waste codes (circle the appropriate waste code)?

D001 TC F001 -F005 P or U Other(describe)

11. Is there any evidence that solvent waste was misclassified?

Yes No

If yes, describe

268.2(f) 268.41 - 268.43

12. Does the facility analyze its waste for TOC and TSS to determine proper treatability group (i.e., wastewater or non-wastewater) or in the case of D001, proper waste subcategory)?

Yes ☒ No N/A All are Nonwastewater.

If no, describe below how this determination is made:

13. Does it appear that any other restricted waste was misclassified or placed in the wrong treatability/sub-category group? Yes ☒ No

If yes, describe:

14. Does the facility, in any way, mix/aggregate/dilute any of its restricted hazardous waste with another hazardous waste, non-hazardous waste or non-waste material prior to (1) storage, (2) treatment or (3) disposal? Yes ☒ No

If no, skip to question 18

If yes, circle (1), (2) or (3) as well as the appropriate one below:

a) D001 - D003 non toxic characteristic waste (NTCW) mixed with non-hazardous waste or non-waste material

b) NTCW mixed with another NTCW

- c) NTCW mixed with D004 - D017 toxic (EP/TC) characteristic waste (TCW)
- d) NTCW mixed with F,K,P or U listed hazardous waste (LW)
- e) TCW mixed with non-hazardous waste or non-waste material
- f) TCW mixed another TCW
- g) TCW mixed with LW
- h) LW mixed with non-hazardous waste or non-waste material
- i) LW mixed with another LW

268.3 55 FR 22537(d.1) (6/1/90)

15. Based on the above and any other observations, does it appear that the facility is using dilution as a substitute for appropriate/legitimate treatment or to improperly switch treatability group (i.e., wastewater vs non-wastewater)?

Yes No

If yes, describe as necessary:

268.41(b) 268.43(b) 55 FR 22537(c.2) (6/1/90)

16. In the case of a mixture of listed wastes, does the facility recognize that the most stringent standard for a particular constituent is the one that applies? Yes No N/A

55 FR 22536(b)

17. In the case of a mixture of wastes with both concentration level treatment standards and specified treatment technology, does the facility recognize that both must be achieved?

Yes No N/A

268.9(b)

18. Where waste or waste mixtures have both characteristic and listed waste codes, does the facility recognize that the treatment standard associated with each characteristic and listed waste must be met unless the characteristic constituent is specifically addressed in the treatment standard for the listed waste?

Yes No N/A

268.9(d)

19. Does the facility send treated characteristic waste (i.e., meets necessary treatment standards) to a Subtitle D landfill?

Yes

No

N/A

If yes, is a copy of the notifications and certifications sent to the EPA Regional Administrator? Yes No

20. Does the facility generate lab packs?

Yes

No

If no, skip to question 23

21. Are there Appendix IV or Appendix V wastes in these lab packs?

Yes

No

268.7(a)(7)&(8)

22. Are alternate treatment standards being applied?

Yes

No

If no, are the proper waste/constituent specific treatment standards being applied? Yes No

If yes -

Has the generator notified the treatment facility, in writing, of all waste codes contained in the lab packs? Yes No

Has the generator stated that its lab pack is an Appendix IV or Appendix V lab pack and certified that hazardous wastes contained therein are listed in the applicable appendix? Yes No

268.7(a)(4)

23. Does the facility treat any of its hazardous wastes in 90 day tanks or containers to meet the applicable treatment standards?

Yes

No

If yes, has the facility prepared a waste analysis plan which includes frequency of testing? Yes No

If yes, has the plan been filed with the Regional Administrator?

Yes

No

268.7(a)(1)

24. Does the generator submitted notifications to the treatment facility if its waste does not meet applicable treatment standards?

Yes

No

N/A

If yes, is there any evidence to indicate that the facility has not referenced the appropriate treatment standards in its notifications? Yes No

If yes, describe:

268.7(a)(1)(ii)

25. Does the facility specify in its notifications the actual treatment standards (i.e., not referencing them) for F001 - F005, F039 or California List wastes? Yes No N/A

268.7(a)(2)

26. Does the facility submit both a notification and certification to the disposal facility that its waste can be land disposed, if it meets the appropriate treatment standards?

Yes

No

N/A

268.7(a)(5) 268.7(a)(7)

27. Has the generator retained in on-site files the following materials:

a) all data used to determine whether its waste is restricted or meets applicable treatment standards upon generation, including knowledge of waste and test results? Yes No

b) copies of all notices and certifications that were sent to treatment/disposal facilities? Yes No

55 FR 22662(A.1) 268.7(a)(6)

28. If the generator treats a restricted waste in a WWTP having an NPDES permit, is there a statement in its operating log indicating that the WWTP is treating a RCRA restricted waste?

Yes

No

N/A

Ashland Chemical personnel do partial Neutralization (Actually pH adjustment) which is allowed under both State and Federal regulation if done in tanks.

Additional Comments
